



ANTALYA ALANYA
OTOYOLU

ANTALYA-ALANYA MOTORWAY PROJECT

STAKEHOLDER
ENGAGEMENT PLAN
DRAFT

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LIST OF ABBREVIATIONS

AAOİAŞ	Antalya Alanya Otoyol İnşaat Yatırım ve İşletme A.Ş.
AFAD	Prime Ministry's Disaster and Emergency Management Presidency
ANTOK	Antalya Orchids and Biodiversity Protection Association
BOT	Build, Operate and Transfer
BOTAS	Petroleum Pipeline Company
CEKUL	Foundation for the Protection and Promotion of the Environment and Cultural Heritage
CIMER	The Presidency's Communication Centre
DSİ	General Directorate of State Hydraulic Works
EIA	Environmental Impact Assessment
EP	Equator Principles
ESIA	Environmental Social Impact Assessment
GBV	Gender-Based Violence
GM	Grievance Mechanism
IFIs	International Finance Institutions
INTES	Union of Construction Industry Employers
ISKUR	General Directorate of Turkish Employment Agency
MoEUCC	Ministry of Environment, Urbanization and Climate Change
PAP	Project Affected People/Population
PCMs	Public Consultation Meetings
SEAH	Sexual Exploitation, Abuse and Harassment
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
TOBB	The Union of Chambers and Commodity Exchanges of Turkey
TURK-IS	Confederation of Unions of Turkish Workers
WGM	Workers' Grievance Mechanism
WWF	World Wide Fund for Nature
YIMER	The Foreigners Communication Centre
YOL-IS	Union of Turkish Roads, Buildings and Construction Workers

I. INTRODUCTION

This Stakeholder Engagement Plan ("the Plan" or "SEP") has been prepared by ENCON Environmental Consultancy Co. (Consultant) for Antalya-Alanya Motorway Project (the "Project or AAMP") in Türkiye. This SEP will be updated in the event of significant changes in the Project and will be reviewed and updated at least annually.

Ministry of Transport, and Infrastructure (former Ministry of Transport, Maritime Affairs and Communications), General Directorate of Highways ("KGM" or "the Administration"), as the owner of the Antalya-Alanya Motorway Project, has tendered for a contract in May 2010 in accordance with the Law on Implementation of Some of the Investments and Services in the Framework of Build, Operate and Transfer Model (Law No: 3996). As a result of the tendering process, KGM has awarded Limak (the Project Sponsor) with a Build, Operate and Transfer (BOT) contract for the implementation of the Project. In this regard, Limak is referred as Project Sponsor in the scope of the plan, and in the ESIA studies.

In accordance with the provisions of the BOT contract, the Project encompasses financing, planning/design, construction, operation, maintenance, and all repair works throughout the operation period, including the transfer of the Motorway to the KGM at the end of the contract period. It is also expected that at the end of the contract period, the Motorway will be handed over to KGM free of any debt or obligation, in a well-maintained and operational condition, without any charges. The Project Sponsor's rights to operate maintain, and repair the Motorway will expire at the end of the contract period specified in the BOT contract.

Stakeholder engagement is the basis for establishing sustainable, constructive, and responsive relationships that are essential for successfully managing a project's environmental and social impacts. The purpose of stakeholder engagement is to establish and maintain a constructive relationship with a various external stakeholders thought the duration of the project. Initiating the engagement process in the early phases of the project helps ensure timely public access to all relevant information. It provides the stakeholders with an opportunity to input into the project design and the assessment of impacts.

The SEP should be easy to understand and straightforward. Its primary focus should be describing the project and identifying the stakeholders involved. It is crucial to determine the information available to the public and where it can be accessed. The SEP must also explain how the public can share their views and opinions, provide a deadline for requirements, and outline how individuals will be notified about any new information or opportunities for feedback or comments. The plan also aims to establish a project-based structure and approach to prevent Gender-Based Violence (GBV) and Sexual Exploitation, Abuse and Harassment (SEAH) throughout the project's entire lifecycle. SEP will be designed to enable the Project Sponsor, Contractor Company, affected local communities, and all other stakeholders to identify and establish an effective engagement strategy.

I.1 Purpose and the Scope of the Stakeholder Engagement Plan

The SEP is a public document which presents plans for stakeholder engagement, information disclosure and consultation. This Plan is valid for the both construction and operation phase of the Project.

SEP covers the following aspects:

- Applicable national and international regulations and IFC requirements on stakeholder engagement, particularly IFC PS1;
- Project plans to engage with stakeholders during the construction phase and the operation phase of the Project;
- Key Project stakeholders that will be identified and will be interacted with;
- Strategy for consultation and information disclosure;
- Timetable for various stakeholder engagement activities;
- Resources and responsibilities for the implementation of the SEP;
- Means of monitoring and reporting on consultation and disclosure activities; and
- A grievance mechanism for stakeholders and the public to raise concerns, provide feedback and comments about the Project operations and how complaints/comments will be handled.

The main goal of this SEP is to ensure that project-affected people and other stakeholders are provided relevant, timely and accessible information so that they have an opportunity to express their views and concerns about the Project and its impacts. Stakeholder engagement process helps to:

- Identify the stakeholders that are affected, and/or able to influence the Project and its activities;
- Identify their particular interests and requirements related to the Project;
- Generate a good understanding of the Project among those that will be affected;
- Identify issues early in the Project cycle that may pose risks to the Project or its stakeholders;
- Provide to these groups opportunities to voice their concerns and opinions;
- Define a consultation approach for stakeholders in relation to operation of the Project;
- Ensure that comments are received in a timely manner so that they can be taken into account during the decision-making process;
- Ensure that mitigation measures are appropriate (implementable, effective and efficient);
- Ensure that adequate and timely information is provided to those potentially affected by a project;
- Ensure a technically and culturally appropriate approach to engagement with all key stakeholders;
- Establish a system for long-term communication between the Project and communities that is of benefit to all parties.
- Identify resources and responsibilities for implementation and monitoring of the consultation program; and
- Set up a grievance mechanism for the stakeholders, including a process to address views and concerns.

The ultimate purpose of this SEP is to establish and maintain constructive relationships with the local community and other interested stakeholders that are essential for the successful management of the Project's environmental and social impacts. The SEP is the responsibility of Project Sponsor and Project Sponsor is fully committed to undertaking necessary engagement activities in a manner that is consistent with international standards and national legislation as outlined in next sections.

The SEP encompasses planned stakeholder consultation activities and the process of stakeholder engagement. The SEP is prepared in compliance with IFC Performance Standards and international requirements and best practices, in addition to Turkish legislation.

I.2 Project Description

The Project (Antalya-Alanya Motorway Project) is one of the two sub-projects that constitute the Afyonkarahisar-Alanya Motorway Project and is designed to connect Serik and Alanya districts through Manavgat district of Antalya province. The project aims to improve transportation services and connectivity to surrounding provinces such as Burdur, Muğla, Konya, Isparta, Karaman, and Mersin. As of April 2025, the motorway is designed to be 117.8 kilometers long and will mainly consist of three lanes, with some sections having two lanes (3x2 and 2x2) in each direction.

Figure 1 presents the current design of Antalya-Alanya Motorway Project's route.

The current Project design includes a total of 117.8 km of road, comprising 84 kilometers of main road (motorway) and 33.8 kilometers of access roads (see Table I.1)

Table I.1 Antalya-Alanya Motorway Sections in the scope of the Project

Project	Start and End Locations of the Section (Km)		Length of the Road (Km)		
	Start Location	End Location	Main Road (Motorway)	Access Roads	Total
Antalya-Alanya Motorway	Km 52+000	Km 136+000	84+000	33+800	117+800

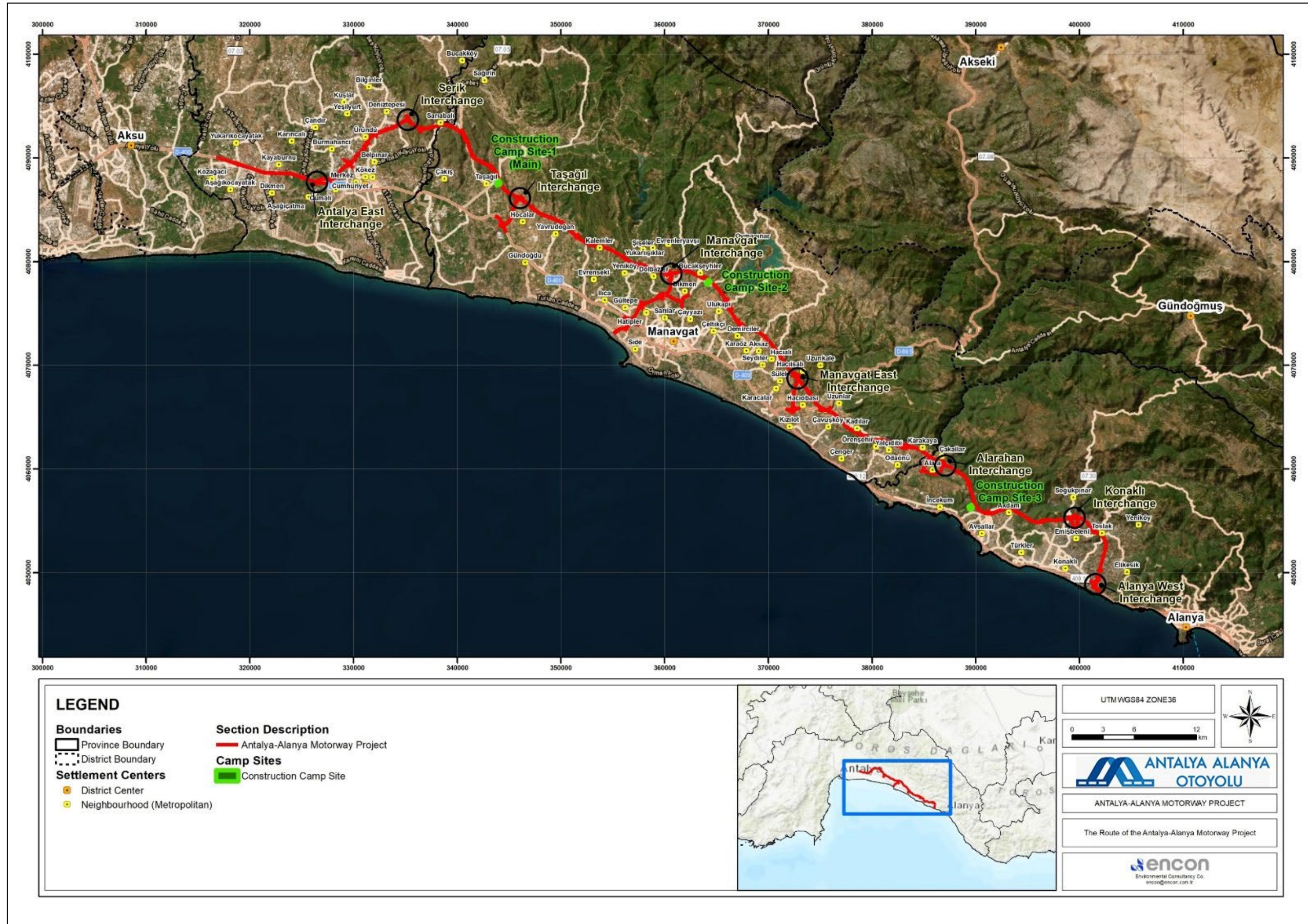


Figure 1. The Route of the Antalya-Alanya Motorway Project

II. PUBLIC CONSULTATION/STAKEHOLDER ENGAGEMENT REQUIREMENTS

Implementation of the Project will follow the framework laws and regulations of the Republic of Türkiye as well as applicable international standard, IFC requirements. In this context, stakeholder engagement activities will conform to relevant IFC Performance Standards (i.e. IFC PS1) Equator Principles 4 (EPFI 5 Stakeholder Engagement, Principle 6 Grievance Mechanism and EU Directives).

Further details of the relevant Turkish legislation and applicable international requirements are provided in the following sections.

II.1 National Regulations and Requirements

Under Article 10, Environmental Law sets out the general scope of the Environmental Impact Assessment (EIA) procedure in Türkiye, indicating that institutions, agencies and establishments that lead to environmental problems as a result of their planned activities are obliged to prepare environmental impact assessment report or Project Information File. Based on this legal framework, the EIA Regulation was put into force for the first time after being published in the Official Gazette numbered 21489 and dated on February 7, 1993. Since then there had been several amendments in the first regulation and new EIA regulations were published in 2008, 2013 and 2014 repealing the former regulations in force. The latest EIA Regulation (2022 EIA Regulation) has been published in the Official Gazette dated 29.07.2022 and numbered 31907, which repealed the 2014 EIA Regulation.

Under its annexes, the EIA Regulation categorizes investments as projects subject to full EIA (Annex-1) and projects subject to screening-elimination criteria (Annex-2). This categorization is done based on the type of activity and/or plant capacity. If the planned investment is defined as an activity under Annex-1 of the EIA Regulation, a full EIA Report is required. For Annex-2 activities, first a Project Information File is prepared in accordance with a limited format specified in the Annex-4 of the EIA Regulation and the MoEUCC evaluates the need for a full EIA process for the project.

The categorization for motorway projects under Turkish EIA regulation is done according to the type or length of the road (km) as follows:

- Full EIA process is required for the following Annex-1 activities;
 - Highways and state motorways (Article 9-c).
- Limited EIA process is required to be conducted for the following Annex-2 activities;
 - Facilities with a production capacity of 5 tons/hour and above, producing shaped materials using cement or other binding materials (Article 18-c),
 - Asphalt plants (Article 22),
 - Provincial roads and ring roads (except neighborhood/village roads; Article 28-d),
 - Addition of tunnels to highways or railways (Article 28-e).

The Project's EIA Report had been prepared in March 2016, submitted to the MoEUCC, reviewed by the evaluation committee and EIA Positive decision had issued in June 2018 In accordance with the EIA legislation in force on the date when the Project EIA Positive Decision was given (2014 EIA Regulation), the EIA Report of the Project has the vested right of upholding its EIA Positive Decision validity for 7 years before the start of the construction works for the Project.

In accordance with the related article, it is the legal responsibility of a project owner to organize an official Public Consultation Meeting for the projects that are included in Annex 1 of the Regulation (as the case in the EU EIA Directive).

As a result, Project Sponsor aims to develop a communication plan to inform relevant stakeholders about the Project activities in operation phase in line with this SEP.

Turkish national policy on protection of environment, cultural heritage and conservation of biological resources has been constituted on the base of relevant international agreements that Türkiye has signed or ratified.

Freedom of Thought and Opinion (Part 2, Fundamental Rights and Duty- Article 25)

Everyone has the right to freedom of thought and opinion and should not be compelled to reveal or be blamed for them.

Freedom of Expression and Dissemination of Thought (Part 2, Fundamental Rights and Duty- Article 26)

Everyone has the right to express and share their thoughts and opinions through speech, writing, pictures, or other media, individually or collectively, and to receive and communicate information and ideas freely without interference from official authorities.

Right of Petition, Right to Information, and Appeal to the Ombudsperson (Part 2, Fundamental Rights and Duty- Article 74)

Citizens and foreign residents can submit their requests and complaints in writing to the authorities and the Turkish Grand National Assembly based on the principle of reciprocity.

Other main national laws/regulations:

Civil Law (Law No. 4721 (Issued on 08.12.2001, Official Gazette No. 24607))

Real property rights and restrictions are defined under the relevant section of Civil Law and will be considered and met throughout the Project according to Turkish Civil Law.

Law on the Right to Information (Law No. 4982 (Issued on 24.10.2003, Official Gazette No. 25269)

The Right to Information Law ensures access to information based on the principles of equality, impartiality, and openness. Everyone has the right to information about public institutions and qualifying professional organizations.

Law on the Use of Right to Petition (Law No.3071 (Issued on 10.11.1984, Official Gazette No. 18571)

Under Article 3 of the Law on the Use of Right to Petition, Turkish citizens and foreign residents have the right to submit written requests and complaints in Turkish to the Turkish Grand National Assembly and relevant authorities.

Expropriation Law (Law No: 2942 (Issued on 04.11.1983, Official Gazette No. 18215))

Another law related to the involvement of stakeholders in the Project is the Expropriation Law.

The Expropriation Law requires public disclosure and a meeting process. It starts with the approval of the relevant authority for the expropriation works in the public interest. This decision is made public for 15 days at the village or neighborhood mukhtars' office, after which it becomes the "cut-off date."

The administration action of the expropriation process is performed in line with the Expropriation Law according to its purpose, authorization, procedure, reason, and the subject of the action.

The responsible agency for Antalya-Alanya Motorway Project (the expropriation procedures will be carried out by KGM) establishes a Valuation Commission to determine the values of assets and resources. Subsequently, a negotiation commission is established to negotiate with property owners on the value. Each negotiation commission consists of at least three members. The Commission

sends an official invitation letter to each property owner without disclosing the previously estimated value of the asset.

The Environmental Impact Assessment Regulation (Official Gazette No: 31907, Article 9)

The EIA Regulation, originally from 1998, has had revisions and was most recently amended on July 29th, 2022. It is based on the EU EIA Directive but includes Turkish laws, making it distinct.

1. The meeting to inform the public about the investment and receive their opinions is held at a central place and time determined by the provincial directorate, with the participation of qualified institutions/organizations, the Ministry, and the project owner.
2. An announcement with the meeting details must be published in a newspaper at least 10 days before the meeting and in a local periodical specific to the region where the Project will be carried out.
3. A public meeting will be chaired by the provincial director or an appointed official to inform and consult with the public about a project. Attendees will be informed about the Project, and their opinions, suggestions, and objections will be recorded in meeting minutes. The minutes will be sent to the Ministry, with a copy kept by the provincial directorate.
4. Before finalizing the format, the Commission members should visit the planned project area and participate in the public information and consultation meeting on the specified date.
5. Stakeholder Engagement Plan (SEP) is prepared by authorized institutions to inform the public about the Project, receive their opinions and suggestions, and is presented in the EIA application file annex. Authorized institutions may request additional activities, such as distributing brochures, conducting surveys and seminars, or preparing a website. The plan may be updated if requested by the Ministry during the EIA process.

The lead government agency responsible for environmental protection in Türkiye is the Ministry of Environment, Urbanization and Climate Change ("MoEUCC"). MoEUCC is the responsible organization for the issuing and implementation of policies and legislation adapted for the protection and conservation of the environment and sustainable development and management of natural resources.

The main responsibilities of the MoEUCC, relevant to the Project, are:

- Implementation of the EIA regulations and decision-making in the EIA approval processes,
- Setting policies and principles for environmental management in Türkiye, including the administrative framework for environmental enforcement,
- Defining and applying environmental quality standards,
- Supervision of the network of environmental laboratories in Türkiye,
- Pollution control and inspection activities,
- Agroforestry support, soil management and erosion control, and
- Protection of Türkiye's natural heritage, including national parks, areas of conservation interest, biodiversity, and wildlife.
- The Gender Based Violence (GBV) Regulation The laws in force in Türkiye related to GBV issues are listed below with publication dates and numbers;
 - Labor Law (Law No. 4857, Issued on 10.06.2003)
 - Turkish Criminal Law (Law No. 5237, Issued on 12.10.2004)
 - Law of Protection of Family and Prevention of Violence Against Women (Law No. 6284, Issued on 20.03.2012)

The purpose of Labor Law (4857) is to govern the rights and responsibilities of workers employed under an employment contract and the working conditions provided by employers. This law applies to all workplaces, employers, employer representatives, and their employees, regardless of their field of activity. According to Articles 24 and 25, termination of the contract is permissible in the event of

Sexual Harassment (SH) in the workplace, allowing the employee or employer to terminate the contract before the term's expiration or without waiting for the notification period.

Turkish Criminal Law aims to prevent crimes and safeguard the rights and freedoms of individuals, public order, security, public health, the environment, and community peace. Articles 102, 103, 104, and 105 in Section 6 detail GBV-related offenses and their penalties, including sexual assault, sexual abuse of children, sexual intercourse with a minor, and sexual harassment.

Law on Protection of Family and Prevention of Violence against Women (6284) is the cornerstone of Türkiye's response to violence against women. This law aims to regulate procedures and principles for the protection of women, children, all family members, and individuals subjected to persistent pursuit. It is rooted in the Turkish Constitution, international conventions to which Türkiye is a state party and relevant legal regulations.

Some key features of the Law No. 6284 include:

- Empowering local authorities to issue injunctions swiftly and efficiently in emergencies.
- Providing support services for survivors and perpetrators of violence, establishing Violence Prevention and Monitoring Centers and outlining the basics for temporary financial aid and medical expenses.
- Introducing preventive and protective measures for survivors, including forced imprisonment in case of a violation of preventive measures, and establishing a mechanism for monitoring the effective implementation of measures.
- Designating the Ministry as an active agent in the prevention of violence against women, granting it various responsibilities, including involvement in judicial cases.
- Basic principles to be observed in the implementation of this law include:
- Providing support and services to victims of violence through a fair, effective, and swift procedure based on basic human rights and equality between men and women.
- Fulfilling measures for victims and perpetrators of violence in a manner consistent with human dignity.
- Ensuring that special measures preventing gender-based violence against women and protecting women from such violence are not interpreted as discrimination under this law.

II.2 International Requirements and Best Practices

International financial institutions follow certain policies and procedures regarding assessment and management of environmental and social impacts of the projects to be financed. The relevant environmental and social requirements of these institutions are mainly based on World Bank Group (WBG) Safeguard Policies. For the private sector financing, WBG/International Finance Corporation's (IFC) Environmental Health and Safety Guidelines and Performance Standards on Environmental and Social Sustainability have become the one of the most important international requirements. These standards have also been adopted by the major international private banks through the so called Equator Principles (EPs). These principles aim to ensure that projects to be financed by these banks are developed in a socially and environmentally sound manner.

The Project is intended to meet applicable international standards and best practices of the International Finance Institutions (IFIs). IFIs consider community engagement as being central to the successful management of risks and impacts on communities affected by projects, as well as central to achieving enhanced community benefits. In this context, SEP follows the requirements of EU directives, IFC PS1 and EPFI Principle 5 and EPFI Principle 6. The IFC PS1 Assessment and Management of Environmental and Social Risks and Impacts covers public consultation and disclosure and in this respect, required consultation and disclosure activities have to be conducted taking the scale and nature of the Project into account covering the following:

- Identifying the range of stakeholders;
- Providing affected communities with access to relevant project information;
- Implementing and maintaining a grievance mechanism; and
- Engaging with and providing information to project-affected and other interested parties throughout the life-cycle of the Project.

II.2.1 Equator Principles IV

Principle 5: Stakeholder Engagement

For all Category A and Category B Projects, the EPFI will require the client to demonstrate effective Stakeholder Engagement as an ongoing process in a structured and culturally appropriate manner with Affected Communities and, where relevant, Other Stakeholders. For Projects with potentially significant adverse impacts on Affected Communities, the client will conduct an Informed Consultation and Participation process. The client will tailor its consultation process to: the risks and impacts of the Project; the Project's phase of development; the language preferences of the Affected Communities; their decision-making processes; and the needs of disadvantaged and vulnerable groups. This process should be free from external manipulation, interference, coercion and intimidation.

Principle 6: Grievance Mechanism

For all Category A and, as appropriate, Category B Projects, the EPFI will require the client, as part of the Environmental and Social Management System, to establish a grievance mechanism designed to receive and facilitate resolution of concerns and grievances about the Project's environmental and social performance. The grievance mechanism is required to be scaled to the risks and impacts of the Project and have Affected Communities as its primary user.

Principle 10: Reporting and Transparency

In addition, regarding reporting and transparency, Principle 10 requires the client to make at a minimum, a summary of the ESIA that includes a summary of Human Rights and climate change risks and impacts when relevant accessible and available online for all Category A and, as appropriate, Category B Projects.

II.2.2 EBRD Performance Requirements

EBRD's performance requirements agree with the approach of the UNECE Aarhus Convention, which identifies the environment as a public good and considers stakeholder engagement as an essential part of good business practices, corporate citizenship, and a way of improving the quality of projects.

In addition, EBRD requires that the projects it supports conform to the purpose and goals of the Aarhus Convention. This Convention assures the rights of access to information, public participation in decision-making, and access to justice in environmental matters, therefore protecting human rights to a healthy environment.

Within this scope, the Project Company will conform to EBRD disclosure and stakeholder engagement requirements as outlined in EBRD's Performance Requirements (PRs) 1 and 10:

PR 1: Assessment and Management of Environmental and Social Impacts and Issues

- Identify and engage with stakeholders in accordance with PR 10;
- Dynamic process of performance monitoring and evaluation, including the monitoring of stakeholder feedback, the local community or inspections by regulatory authorities; and
- Regular reporting to EBRD on stakeholder engagement during project implementation.

PR 5: Land Acquisition, Involuntary Resettlement and Economic Displacement

- Identify people or communities that are affected or could be affected by the project, as well as other interested parties;
- Ensure that stakeholders are appropriately engaged on environmental and social issues that could potentially affect them; this is achieved through a process of information disclosure and meaningful consultation and
- Pay special attention to identifying vulnerable groups living in the project impact area to assess project activities' potential impact on their livelihood and well-being.

PR 10: Information Disclosure and Stakeholder Engagement

- The Project Company will conduct stakeholder engagement based on providing local communities that are directly affected by the project and other relevant stakeholders with access to timely, relevant, understandable and accessible information, in a culturally appropriate manner, and free of manipulation, interference, coercion and intimidation.
- Stakeholder engagement will involve stakeholder identification and analysis, stakeholder engagement planning, disclosure of information, consultation and participation, grievance mechanism, and ongoing reporting to relevant stakeholders.
- The nature and frequency of stakeholder engagement will be proportionate to the nature and scale of the Project and its potential adverse impacts on the affected communities, the sensitivity of the environment and the level of public interest. The requirements of national law for public information and consultation, including those laws implementing host country obligations under international law, will be met.
- The Project Company will define clear roles, responsibilities and authority as well as designate specific personnel to be responsible for the implementation and monitoring of stakeholder engagement activities.

Additionally, the key operational principles of effective engagement for EBRD projects are summarized as follows:

- Providing meaningful information in a format and language that is readily understandable and tailored to the needs of the target stakeholder group(s),
- Providing information in advance of consultation activities and decision-making,
- Providing information in ways and locations that make it easy for stakeholders to access it and that are culturally appropriate,
- Respect for local traditions, languages, timeframes, and decision-making processes,
- Two-way dialogue that allows both sides to exchange views and information, to listen, and to have their issues heard and addressed,
- Inclusiveness in the representation of views, including ages, women and men, vulnerable and/or minority groups,
- Processes free of intimidation coercion ,or incentivization,
- Clear mechanisms for responding to people's concerns, suggestions and grievances; and
- Incorporating, where appropriate and feasible, feedback into project or program design, and reporting back to stakeholders.

II.2.3 IFC's Standards and Guidelines

IFC published its current Policy on Environmental and Social Sustainability in 2012. Within the framework of this Policy, it applies a comprehensive set of Performance Standards to manage social and environmental risks and impacts and to enhance development opportunities in its private sector financing in the member countries eligible for financing. The Performance Standards may also be applied by other financial institutions electing to apply them to projects in emerging markets.

The following eight Performance Standards establish the requirements that the client has to meet throughout the life of an investment supported by IFC or other relevant financial institution using these Standards:

- PS 1:Assessment and Management of Environmental and Social Risks and Impacts
- PS 2:Labor and Working Conditions
- PS 3:Resource Efficiency and Pollution Prevention
- PS 4:Community Health, Safety and Security
- PS 5:Land Acquisition and Involuntary Resettlement
- PS 6:Biodiversity Conservation and Sustainable Management of Living Natural Resources
- PS 7:Indigenous Peoples
- PS 8:Cultural Heritage

PS 1 defines Stakeholder engagement as an ongoing process that may involve, in varying degrees, the following elements: stakeholder analysis and planning, disclosure and dissemination of information, consultation and participation, grievance mechanism, and ongoing reporting to Affected Communities. According to IFC PS 1;

- Clients should identify the range of stakeholders that may be interested in their actions and consider how external communications might facilitate a dialogue with all stakeholders. Where projects involve specifically identified physical elements, aspects and/or facilities that are likely to generate adverse environmental and social impacts to Affected Communities the client will identify the Affected Communities and will meet the relevant requirements.
- The client will develop and implement a Stakeholder Engagement Plan that is scaled to the project risks and impacts and development stage, and be tailored to the characteristics and interests of the Affected Communities.
- The client will provide Affected Communities with access to relevant information on (i) the purpose, nature, and scale of the project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures; (iv) the envisaged stakeholder engagement process; and (v) the grievance mechanism.

- The client will undertake a process of consultation in a manner that provides the Affected Communities with opportunities to express their views on project risks, impacts and mitigation measures.
- The client will conduct an Informed Consultation and Participation (ICP) process that will build upon the steps outlined above in the Consultation and will result in the Affected Communities' informed participation. ICP involves a more in-depth exchange of views and information, and an organized and iterative consultation, leading to the client's incorporating into their decision-making process the views of the Affected Communities on matters that affect them directly, such as the proposed mitigation measures, the sharing of development benefits and opportunities, and implementation issues.

IFC PS2 (Labor and Working Conditions) specifically relates to harassment, intimidation, and/or exploitation. According to IFC PS 2;

- The client will take measures to prevent and address harassment, intimidation, and/or exploitation, especially in regard to women.

Retaliation Risk Prevention and Safe Stakeholder Participation

The Project is committed to ensuring that all stakeholders can freely express their concerns without fear of retaliation. In alignment with the IFC Good Practice Note for the Private Sector: Addressing the Risks of Retaliation Against Project Stakeholders (2021), a series of practical measures have been integrated into the Stakeholder Engagement Plan (SEP) to safeguard stakeholder participation.

As part of the stakeholder identification and mapping process, the Project conducts a risk assessment to identify potential threats of retaliation, particularly toward vulnerable or marginalized groups. This assessment is used to design safe and inclusive engagement approaches tailored to local sensitivities. To further support this, the Grievance Mechanism (GRM) offers multiple anonymous reporting options—such as locked suggestion boxes and secure hotlines—ensuring that all personal data is managed with strict confidentiality in line with national data protection laws and IFC Performance Standard 1.

Sensitive issues, especially those related to gender-based violence and harassment (GBVH), are handled by trained female Community Liaison Officers (CLOs), who adopt a survivor-centered approach and ensure privacy and trust throughout the reporting process. In addition, project staff and grievance handlers receive specific training to recognize and respond to signs of intimidation or retaliation, using appropriate internal protocols to ensure timely and secure handling of such cases.

Allegations or risks of retaliation are closely monitored and promptly escalated to senior management, where necessary. The Project has adopted a zero-tolerance policy for retaliation in any form—whether by project personnel, contractors, or third parties—reinforcing a culture of safety, respect, and open dialogue for all stakeholders involved.

II.2.4 IFI Joint Statement on Continuous Advancement of Standards to Prevent Sexual Harassment, Abuse, and Exploitation

Recognizing the important role they play in both the example they set in their own institutional practices and in the high standards they adopt in their projects and operations, in April 2018, the IFIs reaffirmed their commitment to advance standards to prevent sexual harassment, abuse and exploitation through seven principles. According to IFIs reaffirm their commitment to (Principle 2) establish and maintain standards aimed at preventing sexual harassment, abuse, exploitation and other forms of misconduct. Implementation of this principle can be seen in the following:

- All IFIs maintain codes of ethics/conduct which embed high ethical standards and include provisions on harassment and misconduct including sexual misconduct which are applicable to staff behavior both within and outside the institution. Some IFIs have also

adopted specific policies aimed at preventing and responding to sexual harassment, exploitation and abuse. These are applicable to all staff and are reviewed periodically and strengthened as needed.

- Some IFIs include behavioral clauses in contracts of appointment for non-staff members (including consultants, and contractors) to ensure that they too adhere to expected high standards of behavior. Breach of such provisions would provide an IFI with a right to terminate the underlying contract.

III. PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

In the scope of Antalya-Alanya Motorway Project, various studies were carried out with both internal and external stakeholders before the planned Public Consultation activities in the scope of this SEP. The Project Sponsor recognizes the importance of the stakeholder engagement activities and will carry out the activities planned under this SEP in order to make these activities more efficient, inclusive and continuous. Both internal and external previous stakeholder engagement activities are described in this section.

III.1 Public Consultation Meetings (PCMs) in the Scope of EIA Process

Within the scope of the EIA studies, one public consultation meetings were held alongside the route. The aim of the public participation meeting is to inform people who may be potentially affected about the Project and to understand their concerns, opinions and suggestions about the project. This process is the only formal requirement for stakeholder participation according to Turkish legislation.

The stakeholder engagement activities specific to the Project started at the time of the national EIA process. In this context, Antalya Provincial Directorate of Environment and Urbanization, relevant district Municipalities, District Governorships and Neighborhood/Village mukhtars were contacted in March 2016 to organize the stakeholder engagement activities. The formal stakeholder engagement meetings (public consultation meeting), a requirement of the Turkish EIA Regulation, were held on April 7th, 2016, at Ekşili Village Coffeehouse, Alanya Municipality Çıplaklı Wedding Hall, and Manavgat Chamber of Commerce and Industry Assembly Meeting Hall. Therefore, a total of three consultation meetings were held at three different districts of the Project route (based on EIA report, 2018): Döşemealtı, Alanya, and Manavgat districts of Antalya Province. Table III.1 shows the meetings were announced in one local and one national newspaper as per the regulatory requirements. The meetings comprise the presentation of the Project details such as construction and operation activities, and noted the comments and suggestions by participants during the meetings. The relevant opinions and suggestions are presented in Table III.2.

Table III.1 Information of PCMs in EIA Process

PCMs	Districts	Date	Time	Location
1	Döşemealtı	07.04.2016	09:30	Ekşili Village Coffeehouse
2	Alanya	07.04.2016	11:00	Alanya Municipality Çıplaklı Wedding Hall
3	Manavgat	07.04.2016	15:00	Manavgat Chamber of Commerce and Industry Assembly Meeting Hall

Table III.2 Questions, Opinions, and Suggestions Submitted During the Public Consultation Meeting

Location – Date – Time	Question, Comment, or Suggestion	Response	Main Discussion Points & Feedback Summary
Ekşili Village Coffeehouse / 07.04.2016 – 09:30	A specific location along the project route was mentioned, and concerns were raised regarding the expropriation of houses and pastures. A question was asked about the possibility of changing the route.	It was explained that due to elevation differences and geometric conditions at the connection point, the current route had been selected.	Local concern over property loss and desire for route revision; project constraints due to topography. This issue explained in the Institutional and Legal Framework Chapter.
	A question was raised about whether there is a railway project along the route.	The presence of a railway project was acknowledged, and it was explained that it is a separate and unrelated project.	Clarification requested regarding interaction with other infrastructure projects. This issue explained in the Cumulative Impact Assessment Chapter.
	Questions were asked regarding the expropriation process (e.g., number of	It was stated that the entire process would be carried out in accordance with the Expropriation Law.	Community members requested clarification regarding the legal

Location – Date – Time	Question, Comment, or Suggestion	Response	Main Discussion Points & Feedback Summary
	affected properties, areas involved, and procedures).		procedures and scope of land acquisition. This matter is addressed in detail within the Institutional and Legal Framework section and throughout the RAP.
Çıplaklı Wedding Hall / 07.04.2016 – 11:00	Concerns were raised about the environmental pollution that may occur during construction and operation phases, and its potential impact on nearby settlements and agricultural products. A request was made to change the route.	The route was shown on a map, and it was emphasized that expropriation is necessary to complete the road. Despite the increased cost, alternative solutions such as tunnels were considered in order to safeguard the well-being of the local community.	Participants raised concerns about environmental and agricultural risks and acknowledged the consideration of alternatives such as tunnels. These aspects are addressed in the Land Use and Property section and the Project Description chapter.
	It was stated that the road would divide the village by passing through its center, and a request was made to shift the route 200–300 meters northward (towards the forest).	It was explained that the requested area falls within a wildlife conservation zone and therefore cannot be used.	Route modification options are addressed in the Analysis of Alternatives section, with conservation considerations further discussed in the Protected Areas and Cultural Heritage chapters.
	Participants cited tunnels used in other villages and requested a similar tunnel for their own. They also expressed concerns about an inappropriate route selection for expropriation purposes.	Three participants submitted written statements (recorded in the minutes). No response was provided.	Tunnel requests were raised by the community. Relevant design adjustments are considered in the Project Description and Analysis of Alternatives sections.
Manavgat Chamber of Commerce and Industry – Assembly Hall / 07.04.2016 – 15.00	Negative environmental, agricultural, and tourism impacts were expressed.	It was stated that mitigation measures would be taken during construction, and that during the operation phase, the project would contribute positively to the transportation of agricultural products and increase tourism circulation.	The ESIA comprehensively assesses potential impacts during both construction and operation phases. Specific mitigation measures have been developed accordingly. Additionally, the potential benefits of the Project are also evaluated within the ESIA.
	Negative feedback regarding the project route was shared (e.g., adverse impacts, expropriation issues).	Responses were provided, and it was mentioned that the route could be revised in coordination with relevant authorities, depending on stakeholder feedback.	Route modifications are considered in the Analysis of Alternatives section, based on stakeholder requests and in coordination with relevant authorities.
	Questions were raised regarding potential negative impacts on settlements and the mitigation measures to be taken.	It was explained that measures such as road watering to prevent dust, covering truck trailers, and installing noise barriers would be implemented.	Project routes are defined in the Project Description section of the ESIA, and potential impacts during construction and operation in these locations are addressed in detail throughout the report. Specific mitigation measures are developed in Chapter 15: Community Health and Safety.

During the Public Consultation Meetings (PCMs), the majority of questions, comments, and complaints were related to the proposed route of the Project. Local stakeholders expressed concerns about the potential impacts of land acquisition activities along the route, particularly regarding their effects on the

agriculture and tourism sectors. Accordingly, a significant portion of the complaints received from local residents focused on the loss of agricultural lands and restricted access to tourism facilities.

In the meetings held in and around Manavgat, tourism-related questions predominated, as the proposed Project route passes near touristic areas. Participants frequently requested revisions to the route and raised concerns about the expropriation process. In response, representatives of the relevant authorities emphasized that all procedures will be carried out in compliance with the Expropriation Law No. 2942, ensuring full adherence to national legal frameworks.

Topics such as archaeological sites and protected cultural heritage areas were mentioned less frequently. However, for the questions raised on these matters, project officials clarified that appropriate mitigation measures will be implemented, and coordination with relevant heritage protection authorities will be ensured throughout the project lifecycle.

In June 2024, ENCON conducted a comprehensive four-day field study aimed at gathering qualitative data from a wide range of stakeholders across various regions in Antalya province. The study included interviews and focus group discussions with academics, local authorities, and community members, targeting diverse demographic and occupational groups. The detailed breakdown of the activities conducted during the field study is presented in Table III.3. The feedback received during the interviews and how they were responded to is presented in Table III.4.

Table III.3 Summary of Field Study Activities Conducted by Encon in June 2024

Nu	Work Items	Locations
1. Day		
1	Academician Interview	Akdeniz University/Faculty of Agriculture
2	Academician Interview	Akdeniz University / Faculty of Tourism and Biology
2. Day		
3	Official Institution Interview	Serik District Governor
4	NGO Interview	Head of Serik Chamber of Tradesmen and Craftsmen
5	Key Informant Interview	Serik/ Mukhtar of Merkez Neighborhood
6	Focus Group Interview	Serik / Merkez Neighborhood
7	Focus Group Interview	Manavgat/Taşağıl Neighborhood
8	Vulnerable Group (Elderly) Interview	Manavgat/ Taşağıl Neighborhood
3. Day		
9	Focus Group Interview	Manavgat/Kalemler Neighborhood
10	Vulnerable Group (Women) Interview	Manavgat/Kalemler Neighborhood
11	Focus Group Interview	Manavgat/Ulukapı Neighborhood
12	Vulnerable Group (Women) Interview	Manavgat/Ulukapı Neighborhood
13	Key Informant Interview	Manavgat/ Mukhtar of Ulukapı Neighborhood
14	NGO Interview	Manavgat Head of the Chamber of Agriculture
15	Official Institution Interview	Manavgat Directorate of Technical Affairs
16	Focus Group Interview	Manavgat/Hacısalı Neighborhood
17	Vulnerable Group (Elderly) Interview	Manavgat/Hacısalı Neighborhood -Ayrancılar
4. Day		
18	Key Informant Interview	Manavgat/ Mukhtar of Karakaya Neighborhood

19	Focus Group Interview	Manavgat/ Mukhtar of Karakaya Neighborhood
		Alanya/ Mukhtar of Çakallar Neighborhood
		Alanya/ Alara Neighborhood Household
20	Focus Group Interview	Alanya/Akdam Neighborhood
21	Focus Group Interview	Alanya/Toslak Neighborhood
		Alanya/Konaklı Neighborhood
		Alanya/Alara Neighborhood
		Mukhtars and Households
22	Key Informant Interview	Alanya/ Mukhtar of Toslak Neighborhood

Table III.4 Summary of Field Study Interview Conducted by Encon in June

Interview Type and Location	Summary of the Interview	Main Discussion Topics and Responses
Akdeniz University / Faculty of Agriculture – Academic Interview	Emphasis was placed on the protection of agricultural lands, prevention of zoning pressure, and continued support for small-scale producers. Protection of underground water resources was also requested.	Agricultural lands will be preserved, and monitoring and preventive measures for water resources will be implemented to support farmers' activities.
Akdeniz University / Faculty of Tourism and Biology – Academic Interview	Recommendations included preventing fragmentation of natural habitats, using local plant species (olive, carob) in medians, and declaring the Alarahan area a nature park.	The route was planned to avoid habitat fragmentation. Local species will be used in landscaping, and coordination with relevant institutions will be ensured.
Serik District Governorate – Official Institution Interview	The project is viewed positively; however, it was requested that construction not coincide with tourism and agricultural seasons.	Efforts will be made to ensure that construction activities do not overlap with peak tourism and harvest periods.
Serik Chamber of Tradesmen and Craftsmen – NGO Interview	The road is expected to benefit tradespeople and farmers; it was requested that rest areas be designed to support commercial activities.	Rest facilities will be made accessible to local producers and tradespeople to support commercial activities.
Serik / Merkez Neighborhood – Mukhtar Interview and Focus Group	Requests included ensuring road access to villages, controlling dust/noise, and increasing information dissemination.	Noise and air quality control measures will be implemented and monitored. Village access will be maintained with planned connection roads. An inclusive grievance mechanism has also been developed.
Manavgat / Taşağıl Neighborhood – Focus Group and Elderly Group	Elderly individuals face challenges accessing information; it was suggested to use audio announcements.	Information access for the elderly will be provided through public announcements in spaces such as mosques and mukhtar offices.
Manavgat / Kalemler Neighborhood – Focus Group and Women Group	The road's positive contribution to health and agricultural access was noted; women expressed social support needs.	Social support requests specific to women will be considered.
Manavgat / Ulukapı Neighborhood – Focus Group, Women Group, Mukhtar	Requested the preservation of field roads and uninterrupted access during construction.	Field roads and connections between settlements will be maintained with underpasses and overpasses ensuring uninterrupted access.
Manavgat Chamber of Agriculture – NGO Interview	Support for producers and participation in decision-making processes were requested.	Regular coordination and information meetings will be held with producer unions.
Manavgat Directorate of Technical Affairs – Official Institution Interview	Requested compatibility with urban planning and integration with public infrastructure.	Planning will be coordinated with municipalities, and infrastructure transitions will be integrated into the project.
Manavgat / Hacısalı Neighborhood – Focus Group and Elderly Group	Requested reduction of social isolation and safe crossings.	Safe pedestrian crossings and transport services will be provided.
Manavgat / Karakaya Neighborhood – Mukhtar and Focus Group Interview	Suggested preventing the village from being divided and constructing tunnels/underpasses.	Underpasses and bridges will be evaluated for critical crossing areas.
Alanya / Akdam, Toslak, Konaklı, Alara – Focus Group and Mukhtars	Requested support for loss of agricultural land, routing away from residential areas,	Support will be provided to affected producers and alternative route scenarios

	and eco-tourism-oriented rest areas.	have been evaluated. Eco-tourism-focused designs will be considered for rest areas.
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The EIA Review and Evaluation Commission set up by the MoEUCC; General Directorate of EIA, Permit and Inspection at the scoping stage of the national EIA processes included the governmental stakeholders listed in Table III.5.

Table III.5 Governmental Stakeholders Involved in the Scoping, Review and Evaluation of the National EIA Process

Organization	Directorate/ Administration
General Directorate of Highways	General Directorate of Highways 13th Regional Directorate
Governorship of Antalya	Investment Monitoring And Coordination Department Antalya Governorship Repealed Provincial Directorate of Agriculture Antalya Governorship Provincial Directorate of National Education
Antalya Metropolitan Municipality	Department of Housing and Urbanization Department of Real Estate and Expropriation
Ministry of Transport and Infrastructure	Antalya Airport Chief Directorate
General Directorate of Mineral and Research and Exploration	General Directorate of Mining Affairs, Exploration Department
Ministry Of Agriculture And Forestry	General Directorate of State Hydraulic Works Department of Survey, Planning and Allocations Directorate General of Agricultural Reform General Directorate of Nature Conservation and National Parks General Directorate of Forestry Department of Permits and Easements
Ministry of Forestry And Water Affairs	Repealed Ministry of Forestry and Water Affairs 6th Regional Directorate Antalya Branch Directorate
Repealed Electricity Generation-Transmission Inc. (TEAŞ)	General Directorate of Electricity Generation Corporation
Ministry of Culture and Tourism	Directorate General of Investments and Enterprises Regional Board of Protection of Cultural Heritage
Ministry of Environment, Urbanization and Climate Change	General Directorate of Conservation of Natural Assets Provincial Directorate of Environment, Urbanization and Climate Change
Ministry of Interior	Provincial Directorate of Disaster and Emergency
Ministry of National Defense	General Directorate of Machinery and Chemical Industry Corporation
Ministry Of Industry And Technology	Directorate General for Industrial Zones

The EIA Application File was prepared on behalf of General Directorate of Highways and submitted to the Ministry of Environment and Urbanization by the e-EIA system on 04.03.2016, and the EIA process was initiated. During the preparation of the Project's EIA Report, the comments and opinions expressed by the local communities during the Public Participation Meeting, and the official views of the governmental stakeholders that formed the EIA Review and Evaluation Commission, were incorporated. Following the finalization of the report, the EIA was disclosed to the public via the MoEUCC and the Provincial Directorate of the Environment, Urbanization and Climate Change as per the requirements of the national EIA Regulation.

III.2 Stakeholder Engagement as part of the ESIA Process

The expert team in Encon held two separate field studies as part of the ESIA study, as summarized in Table III.6. The first one was a reconnaissance study carried out on May 2-3, 2024 with the main objective of identifying the environmental and social features and sensitivities of the Project. This included planned art structures along the motorway route, campsites, quarries, and facilities such as the concrete plant, asphalt, and mechanical plan.

The second field study, conducted on 3-6 June 2024, focused on key informant, focus group, vulnerable groups, and other stakeholders (NGOs, Academicians, Communities, etc., in the region) interviews. During the social field study, key informative interviews were conducted with the mukhtars of four (4) settlements previously determined. Focus group interviews were held in eight (8) settlements, including mukhtars and households of 12 neighborhoods in the impact areas. Focus group interviews in Serik Merkez, Taşağıl, Kalemler, Ulukapı, Hacısalı, Karakaya-Çakallar-Alara, Akdam, and Toslak-Konaklı-Alara neighborhoods; and vulnerable group interviews were conducted in those areas. Additionally, other stakeholders such as academics, local officials, and local communities were interviewed to gather expert opinions on the socio-economic impacts of the Project.

Table III.6 Summary of the Social Field Studies Conducted as part of the ESIA

Tasks	Date of the Field Study	Scope of the Field Study
Site visit	2-3 May 2024	<ul style="list-style-type: none"> The reconnaissance study started at Km: 52+000, and ended at Km: 135+000 Visiting the license area: planned tunnel, viaduct, quarry, facility area, and construction site and storage area.
Key Informant Interviews Focus Group Interviews, Other Stakeholder Meetings	3-6 June 2024	<ul style="list-style-type: none"> Four (4) key informant interviews in Serik/Merkez, Manavgat/Ulukapı, Manavgat/Karakaya, and Alanya/Toslak neighborhoods Eight (8) Focus group interviews in Serik Merkez, Taşağıl, Kalemler, Ulukapı, Hacısalı, Karakaya-Çakallar-Alara, Akdam, and Toslak-Konaklı-Alara Interviews with Academics, local officials, and local communities
Road Trip Study Public Consultation Meetings (PCMs)*	Third Quarter 2025	<ul style="list-style-type: none"> Informing the local community about the Project and collecting feedback from stakeholders, including complaints, suggestions, and opinions.

**Shuttle vehicles will be arranged for appropriate residential areas in order to facilitate access to the Public Participation Meetings and to increase attendance rates.*

In parallel to the ESIA studies, the Company has started to establish close relationships. In this scope, Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş. participate the reconnaissance study in the project area May, 2024.

A Stakeholder/Public Consultation Meeting (PCM) will be organized after the finalization of the expropriation plan by the General Directorate of Highways (KGM). During the meeting, details about the project, its potential environmental and social impacts/risks, mitigation measures to be taken, and implementation/ monitoring/reporting responsibilities of different parties will be shared with the stakeholders; and then their opinions and suggestions will be received during the question-answer (Q&A) session.

III.2.1 Road Trip

In December 2024, Public Consultation Meetings (PCMs) was planned to be held in the four most affected locations related to the "Road Trip" study. However, due to delays in the completion of expropriation procedures, these meetings have been postponed and will be organized once sufficient progress has been made. These meetings aim to disclose Project impacts and planned mitigation measures, while creating a space for meaningful public feedback prior to the commencement of construction.

For the Project, four Public Consultation Meetings (PCMs) are to be held in selected locations: Merkez (Serik, Antalya), Ulukapı (Manavgat, Antalya), Karakaya (Manavgat, Antalya), and Konaklı (Alanya, Antalya). It is preferred that venues within local neighborhoods, which possess adequate capacity and appropriate physical conditions, are used for these meetings. This preference is based on the observation that participation levels are generally higher in such local venues, according to past experiences. Moreover, selecting the exact place/location will be considered to create a more inclusive environment that enables women and vulnerable groups to participate. Figure 2 and Figure 3 shows the locations of the planned PCMs. and those that social field study was conducted.

To ensure broad awareness and community participation, announcements regarding the PCMs will be made through multiple channels, including: public bulletin boards in central neighborhood locations, local mukhtars' offices, municipality websites, and local radio broadcasts where feasible. Additionally, printed invitations and visual materials such as posters and leaflets will be distributed, and mobile messaging applications (e.g., WhatsApp groups commonly used in local communities) may also be utilized to reach wider audiences. In addition to those the announcement at the national newspaper will also be done. All announcements will be made at least two weeks prior to the meetings and will be provided in Turkish, with Arabic translations where needed to ensure inclusivity for refugee or migrant populations.

PCMs will take place along the entire Motorway route from the Serik district to the Alanya district of Antalya province. Table III.8 displays details about the planning of PCMs, which will be finalized after determining a specific date and time. The meeting locations were selected based on findings from key informant and focus group interviews conducted in the region by a social expert employed in ENCON. The overall motorway route spans 117.8 km, including the main carriageway and the access roads. Since it would not be possible to organize a meeting in every settlement that is located within the study area, in the selection of the settlements at which the public consultation meetings are planned, it is aimed that a meeting location is determined every 30 (plus minus) km along the Motorway route to ensure to the extent possible that the meeting location is accessible for the local people from the surrounding settlements and in order to acquire a more inclusive Road Trip for all different stakeholders.

The meetings were held with the participation of representatives of Limak as Project Sponsors (senior officials and technical Project team members including design and expropriation), authorities from the 13th Regional Directorate of KGM, and the Environmental and Social Impact Assessment (ESIA) Consultant (ENCON Environmental Consultancy Co.).

The ESIA Consultant will moderate the meetings. The meetings will commence with an introduction and an explanation of the meeting's purpose and scope. This will be followed by a presentation from the ESIA consultant and a final discussion session to address any questions, concerns, and suggestions. The main topics to cover in the presentations are as follows:

- What is the Antalya-Alanya Motorway Project?
- Who are the project sponsor and ESIA Consultant?
- What are roles of the Project Sponsor and ESIA Consultant?
- What are the Anticipated Benefits of the Project?
- What is the Environmental and Social Impact Assessment Process?
- Stakeholder Engagement: How to Participate in the Process?
- Discussion (Questions and Answers) Session

Large-scale (in A0 format) maps showing the relevant part of the route in each meeting will be posted on the walls of the meeting venue. In addition, project information brochures (including guide for land acquisition and compensation) will be shared with the participants. As a result of the information efforts, the attendance levels at meetings, particularly those that might be held in local neighborhood tea houses, will be adjusted to reach the expected number of participants. Different parties are expected to participate, including government officials or (significantly) from adjacent neighborhoods. Table III.7 shows the expected local representatives of participant profile in planned PCMs. A list of participants will be maintained at the meeting.

Each meeting is scheduled to last around 1.5 hours. Due to the effects of the pandemic and possible hot weather conditions in the region, meetings held indoors are expected to last approximately 1 hour. However, it is possible that questions and suggestions from participants could extend the duration of meetings in some locations. Additionally, photographs taken during the meetings will be included in the report.

Table III.7 Summary of Participants Profiles

PCM No	Meeting Location	Adjacent Neighborhoods from which Representatives (Mukhtar or Local People) will Participated in the Meeting
11	Merkez	Yukarıkocayatak, Aşağıkocayata, Kayaburnu, Dikmen, Çandır, Aşağıçatma, Burmahancı, Merkez, Cumalı, Üründü, Kökez, Deniztepesi Sarıbalı, Çakış, Sağırın, Taşağıl, Hocalar, Gündoğdu, and Yavrudoğan neighborhoods
22	Ulukapı	Kalemler, Yeniköy, Şişeler, Evrenleryavşı, Dolbazlar, Yukarıışıklar, Sarılar, Hatipler, Gültepe, Ilica, Side, Dikmen, Bucakşeyhler, Ulukapı, Aşağıışıklar, Demirciler, Karaöz, Aksaz, Hacıali, Cevizler, Sülek, and Hacısalı neighborhoods
33	Karakaya	Hacıobası, Karacalar, Kızılot, Uzunlar, Çavuşköy, Kadılar, Örenşehir, Yalçıdibi, Odaönü, Karakaya, Alara, and Çakallar neighbourhoods,
44	Konaklı	İncekum, Avsallar, Akdam, Türkler, Soğukpınar, Emışbeleni, Toslak, Konaklı, and Elikesik neighbourhoods

Table III.8 Organizational Details of the Planning Public Consultation Meetings in Antalya*

PCM No	Province	District	Neighborhood	Km Chain age	Population (TURKSTAT, 2024)	Date of the Meeting	Time of the Meeting	Meeting Venue	Number of Participants
1	Antalya	Serik	Merkez	Km 25+000	17,969	Third Quarter 2025	-	-	-
2	Antalya	Manavgat	Ulukapı	Km 90+000	3,797	Third Quarter2025	-	-	-
3	Antalya	Manavgat	Karakaya	Km 115+000	452	Third Quarter 2025	-	-	-
4	Antalya	Alanya	Konaklı	Km 140+000	17,927	Third Quarter 2025	-	-	-

*To facilitate access to the upcoming Public Participation Meetings and to increase attendance rates, shuttle vehicles will be arranged for the eligible residential areas specified in Table III.7



Figure 2. Locations of Conducted Social Field Study



Figure 3. Locations of Planned Public Consultation Meeting

III.2.2 Internal Stakeholder Engagement Activities

Employee Satisfaction Survey

The internal stakeholders of a project are crucial for its healthy progress. The largest group of internal stakeholders in terms of quantity is the employees. Employees of the project sponsor and subcontractors are involved in all stages of the Project's life cycle. Therefore, engaging with internal stakeholders through stakeholder engagement activities is an essential and crucial key performance indicator criterion. The project sponsor is expected to conduct various stakeholder engagement activities with internal stakeholders.

As part of internal stakeholder engagement activities, the Project Sponsor may conduct an employee survey to gather feedback on the overall operation of the Project. This survey aims to identify areas for improvement in management and the workplace and emphasize the importance of gender equality. By doing so, the Project aspires to promote inclusivity and create a better working environment for all employees, ensuring that everyone's views are valued and considered in the quest to enhance workplace dynamics and fairness.

The suggested employee questionnaire is prepared with at least a 5-point Likert scale. The survey study is set up to analyze the answers given by the employees to the given statements. The answers are categorized as strongly disagree (1), disagree (2), partially agree (3), agree (4), and strongly agree (5). The statements given to the employees to express their opinions within the scope of the survey are as follows:

1. I am satisfied with the cafeteria and the food served.
2. In the workplace, cleanliness, organization, and order are given importance.
3. The company attaches great importance to occupational health and safety issues.
4. The company provides the personal protective equipment required for the job.
5. I am satisfied with the working hours.
6. The behavior of the employees towards each other is good.
7. I have access to the things I need to do my job well.
8. My salary makes me satisfied.
9. In general, I am happy with my supervisor/top manager.
10. I am satisfied with the Company's Management.
11. Necessary security measures (other than occupational health and safety issues) are taken in our company.
12. I recommend this company to work with.
13. I am satisfied with the possibilities offered for the service.
14. Social areas within the construction site where we can spend time outside work are sufficient.
15. I am happy with the laundry and dormitory conditions.
16. The company promotes gender equality and ensures equal opportunities for all employees.

This survey will be conducted separately by the female CLO for the female employees, and in order to avoid trust issues, it will be stated that the female employees will share all their problems except for the questions and that these will remain anonymous if they wish. How the process of complaints or requests received here will work is explained in the Grievance Mechanism section.

Provide SEAH and GBV training or develop a safety plan for women workers before the construction starts. It is detailed at Labor and Working Conditions chapter at ESIA.

IV. STAKEHOLDER IDENTIFICATION

In order to develop an effective SEP, it is necessary to determine who is likely to be affected (both directly and indirectly) by the Project ("affected parties"); who may have an interest in the Project ("interested parties"); and have the potential to influence project outcomes or operations.

An important stage of the stakeholder identification is the groups that are likely to be affected by the Project more or differently than other stakeholders, and whose influence on these possible impacts is expected to be relatively low. These groups are defined as "vulnerable groups" in the literature. One of the aims of the stakeholder engagement plan is to carry out an effective and sustainable communication, information and consultation process with these vulnerable groups. For this purpose, this SEP covers the following objectives related to vulnerable groups:

- Identifying vulnerable groups,
- The method and frequency of communication with vulnerable groups,
- Opportunities and priorities for vulnerable groups,
- Monitoring process,

IV.1 Stakeholder Identification Methodology

Stakeholders were identified through a structured and participatory methodology aligned with international best practices, including IFC Performance Standard 1, the Equator Principles, and the EBRD's Performance Requirement 10.

The identification process aimed to ensure the inclusion of all individuals, groups, and organizations who may be directly or indirectly affected by the project or who may influence its outcomes. The detailed methodological steps followed during this process are presented in Table IV.1.

Table IV.1 Methodological Steps for Stakeholder Identification Aligned with International Standards

Method	Description	Key Focus Areas	Target Groups / Sources
Desk-Based Review	Review of existing documentation and spatial data	Identification of affected areas, land parcels, community assets	ESIAs, Resettlement Frameworks and Baseline Studies, Local government records and cadastral maps, Previous stakeholder engagement records
Field Visits & Observations	On-site visits along proposed motorway corridor	Land use, mobility, seasonal migration (e.g., Yörük routes), presence of informal or unregistered groups	Local terrain and communities along the corridor
Key Informant Interviews (KIIs)	Semi-structured interviews with diverse local actors	Local insights on social dynamics, vulnerabilities, potential project impacts	Mukhtars, women, elderly, farmers, Yörük communities, seasonal workers, NGOs, CSOs
Vulnerability Mapping	Identification and assessment of at-risk populations	Vulnerability related to land acquisition, access to information, livelihood risks, social marginalization	Illiterate adults, women-headed households, seasonal workers, elderly, disabled, refugees

IV.1.1 Stakeholder Categorization

Stakeholders were categorized into Project-Affected People, Vulnerable Groups, Interested Parties, and Governmental and Regulatory Stakeholders. This multi-tiered classification ensured a comprehensive and inclusive approach focused on human rights risks related to displacement, participation, and access to remedies (see Table IV.2).

Table IV.2 Stakeholder Categorization

Category	Description / Details
Project-Affected People (PAPs)	Individuals and households directly impacted by land acquisition or construction activities; business owners
Vulnerable Groups	Those with limited capacity to participate in decision-making or to absorb adverse impacts
Interested Parties	Institutions, NGOs, unions, academic groups, business owners, or the general public with a stake in the project outcomes. This includes civil society actors and service organizations supporting local communities, including those involved in health, social welfare, gender-based violence response, shelter, or community development.
Governmental and Regulatory Stakeholders	Local, provincial, and national-level authorities responsible for project permitting and oversight. This also includes emergency response units (e.g., disaster management authorities, fire brigades), public health services, municipal utilities, and security or protection bodies involved in addressing GBV and community safety.

The vulnerable groups identified in the Project are as follows:

- Women head of household
- Elderly people / older adult who need care and social assistance
- Disabled (Physical / Mental)
- Unemployed people (even though they are looking for a job)
- Women who lost their spouses/divorced
- Those who are homebound due to chronic illness
- A child of school age who cannot go to school
- Illiterate adult
- Farmers who lost more than 20% of total productive area due to expropriation
- Seasonal agricultural workers
- Refugee and Immigrant
- People from different religions and sects
- Ethnic minority groups
- Yörüks

Gender inequality may be seen in stakeholder engagement process. Although it is not defined as a vulnerable group on its own, it is necessary to be sensitive to situations where women cannot take part in these stakeholder engagement activities. Project Sponsor should consider gender equality in the stakeholder engagement processes of the project and should approach with sensitivity to the problems that may arise in this regard. Project Company will take short and long-term steps towards resolving these problems. Arranging time and space so that women can participate in meetings and other events equally is one of the simplest and most effective steps that can be taken in this regard. In addition to the above-mentioned vulnerable groups, gender equality will be considered in the process of stakeholder identification, consultation with stakeholders and grievance management process.

In the context of the Project, women are identified as a vulnerable group due to a combination of socio-economic, cultural, and spatial dynamics that influence their exposure to project-related impacts. Because the location area of the project is rural and peri-urban areas, women often rely on informal or subsistence-based economic activities—such as agriculture, livestock care, and seasonal labor—which are typically unregistered and under-recognized in compensation and livelihood restoration schemes. Moreover, women may face mobility restrictions due to gender norms and lack of access to private transportation, which can be further exacerbated if the motorway alters local routes, increases travel distances, or reduces public transportation availability. In areas like Manavgat, where tourism

and agriculture are dominant, women's economic roles are often linked to place-based activities (e.g., local markets, childcare close to home), making them more vulnerable to displacement or disruption. Additionally, the influx of a temporary male workforce during construction may elevate risks of gender-based violence and harassment, particularly in communities with limited protective infrastructure or social services. For these reasons, it is crucial that the project incorporates a gender-sensitive approach in its impact assessments, stakeholder engagement processes, and mitigation strategies to ensure that women's voices are heard, their specific risks addressed, and their livelihoods and well-being protected.

In the neighborhoods within the impact area of the project, especially in the Central neighborhood of Serik district, it was determined in the field study conducted by Encon in June 2024 that Syrians under temporary protection status and Syrian Migrants live. According to Refugees Association's May 2025 Report, the number of Syrians living in Antalya is 6839. Attacks against Syrian refugees, especially in Serik district, were reported in the news.

On the other hand, nomads living in the Antalya region go to the plateau at certain times of the year. Antalya-Serik-Ovacık plateau visited by Yoruks is located within the project area. Nomads who will pass through this region are a vulnerable group both in terms of the impact of construction on their journeys and in terms of accommodation. The migration pathway of nomads is given in FigureVII.1 as referenced to the motorway alignment.

On the other hand, nomads living in the Antalya region go to the yayla at certain times of the year. A section of the migration route to the Antalya-Serik-Ovacık yayla, which is visited by the Yörüks, is located 1,200 meters from the project area. Nomads passing through this region are a vulnerable group in terms of both the impact of construction on their journeys and accommodation. The migration route of the nomads is given in Figure 4 according to the highway route.

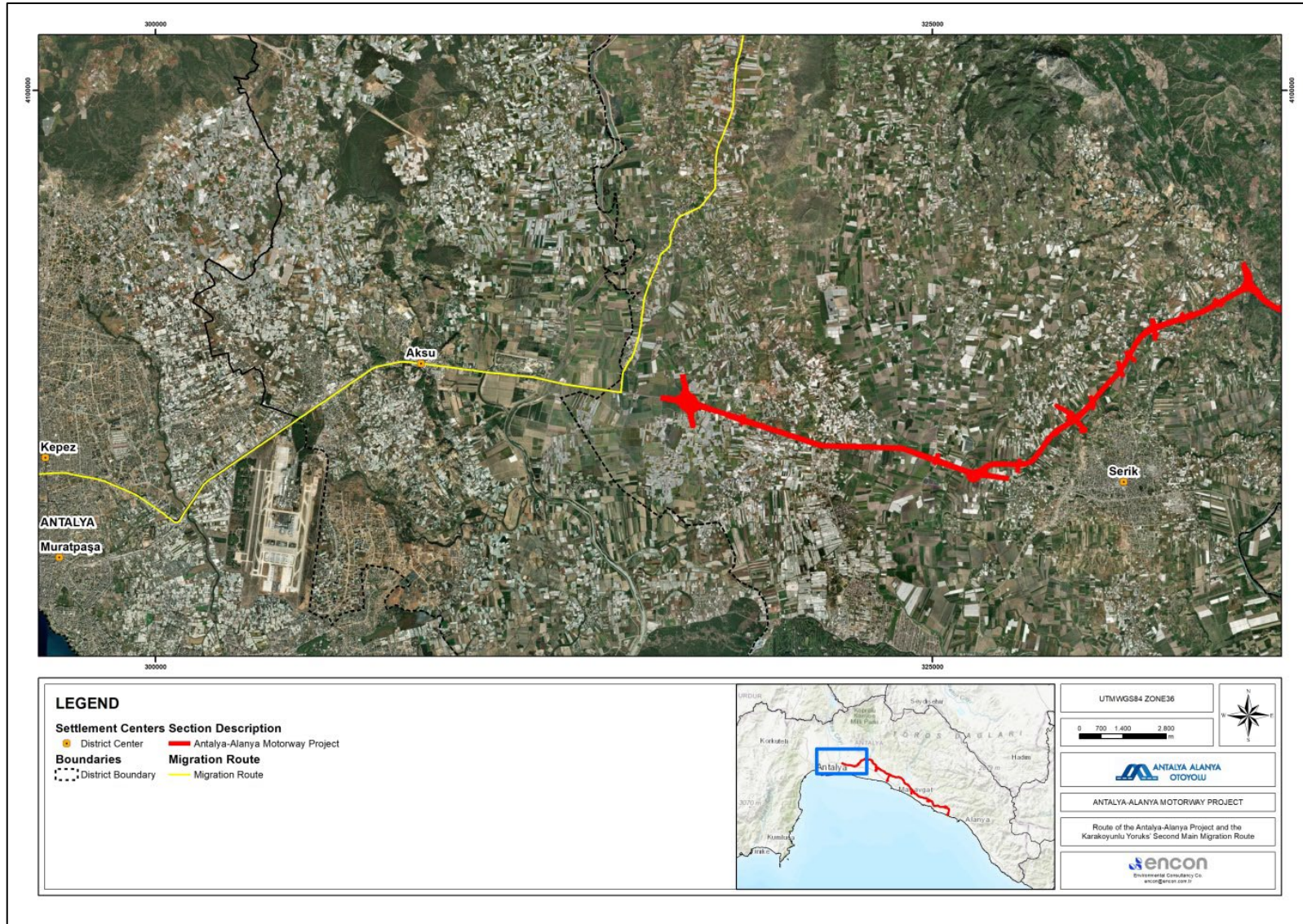


Figure 4. The Migration Pathway of Nomads in the Region

Project-Affected People (PAPs)

Project-Affected People (PAPs) are defined as individuals, households, or communities who will experience either physical or economic displacement as a result of the Antalya–Alanya Motorway Project. The identification of PAPs is based on expropriation plans (as of April–May 2025), site-specific scoping studies, and preliminary stakeholder consultations. Impacts vary by geography, land tenure, land use, and vulnerability status. The categories of Project-Affected People (PAPs) identified for the Antalya–Alanya Motorway Project are summarized in Table IV.3, based on expropriation plans, scoping studies, and preliminary consultations, reflecting variations in land tenure, land use, and vulnerability.

Table IV.3 Categories of Project-Affected People (PAPs) for the Antalya–Alanya Motorway Project

Category	Description / Key Details
1. Landowners and Land Users	- 2,085 privately-owned parcels to be expropriated (~50% of total 7.7 million m ²) - Includes agricultural fields, orchards, greenhouses, constructible plots - ~29% of affected parcels will become “orphaned land” - Some lands informally used by non-owners (farmers, tenants)
2. Structure Owners	- 304 houses, 831 greenhouses, 29 business structures affected - Distributed across 610 parcels, many with multiple structures - Includes small-scale agricultural and informal businesses
3. Livelihood-Dependent Farmers	- Households losing >20% of productive land, especially greenhouse/orchard farmers, at high economic displacement risk - Parcels <500 m ² post-expropriation considered unviable for farming
4. Residents in Fragmented or Severed Parcels	- Parcels divided by motorway causing difficult or impossible internal access - Planned engineering solutions (underpasses, culverts) to mitigate access loss; effectiveness to be confirmed via RAP consultations
5. Vulnerable and Marginalized Groups	- Illiterate adults unable to comprehend expropriation/compensation - Elderly with limited mobility/access - Women without land title or informal income earners - Migrants, refugees, seasonal workers with undocumented tenure - Semi-nomadic Yörük communities with migration routes crossing project area
6. Users of State-Owned and Public Lands	- Greenhouses/agricultural plots on state treasury or forest lands used informally by locals - May qualify for compensation or assistance under national policies or livelihood restoration programs

Project-Affected People by Settlement (Site-Specific Summary)

Based on the expropriation data and field surveys from April–May 2025, the following neighborhoods are most significantly affected:

IV.1.2 Serik District:

The number of affected parcels, land use types, and specific conditions across local areas within the project are summarized in Table IV.4.

Table IV.4 Number of Affected Parcels and Characteristics by Local Area within the Serik District

Local Area	Number of Affected Parcels	Land Use / Characteristics	Key Notes
Deniztepesi	25	Residential and agricultural use	Limited infrastructure, aging population
Sarıbalı	136	Orchards and greenhouses	Farmers at high risk of losing productive assets
Üründü	73	Agricultural land	Presence of fragmented parcels increases vulnerability
Burmahancı	87	Agricultural land	Many parcels will be under 500 m ² post-expropriation; risk of orphan land
Cumalı & Aşağıçatma	Over 80	Mixed land use with non-formal structures	—
Çandır, Kayaburnu, A.Kocayatak	Limited number	—	Intersects Yörük migration routes

IV.1.3 Manavgat District:

The number of affected parcels, land use types, and specific conditions across local areas within the project are summarized in Table IV.5.

Table IV.5 Number of Affected Parcels and Characteristics by Local Area within the Manavgat District

Local Area	Number of Affected Parcels	Land Use / Characteristics	Key Notes
Taşağıl	217	Houses, greenhouses, pasture areas	High livelihood dependence
Çakış	Over 40	Multiple structures, fragmented lands	—
Hocalar	137	Includes forest or common lands	Vulnerable elderly population reported
Yavrudoğan	62	—	—
Çolaklı	48	—	—
Kalemler	190	Some orphaned private lands with remaining area less than 500 m ²	—
Evren, Yeniköy, Şişeler	Over 150	Some parcels located in informal tenure zones	—

IV.1.4 Alanya District:

The number of affected parcels, land use types, and specific conditions across local areas within the project are summarized in Table IV.6.

Table IV.6 Number of Affected Parcels and Characteristics by Local Area within the Alanya District

Local Area	Number of Affected Parcels	Land Use / Characteristics	Key Notes
Alara, Çakallar, Akdam	Over 500	Many greenhouses; intensive horticulture activities	—
Avsallar, İncekum, Türkler	—	Commercial orchards; significant seasonal worker presence	—
Toslak, Elikesik, Telatiye	200+	Mixed tenure and land use; includes forestry overlaps	—

As identified in previous field studies:

- 1 household of three people will be directly affected, their land and house,
- One household's house will be demolished and their plans to start a business on the land they own where the road passes will be affected.
- Five other families, for whom only names and contact information are available, are among those directly affected.

During the Public Consultation meetings that will be organized at third quarter of 2025, these people will be re-interviewed and their impact status will be detailed.

Within the scope of the Project, it is important to identify stakeholders at the beginning of the process to inform key stakeholders (local people, relevant state institutions and NGOs) about the Project and provide effective participation of the stakeholders. To this end, the following individuals and groups should be considered specifically:

- People who are likely to be affected, directly or indirectly by the Project,
- People or institutions may have an interest in the Project,
- People or institutions that have the potential to influence
- Project outcomes or company operations.

Besides it is an important process to identify vulnerable or disadvantaged people or groups, who are likely to be affected by the Project in certain phases, accurately during the identification of stakeholders. Possible stakeholders who are likely to be affected by the Project or have an influence on the Project are listed below:

- Project employees, including Contractors. Project parties;
- National governmental and non-governmental organizations (NGOs);
- Local governmental organizations and NGOs;
- Local residents (potentially project affected persons including vulnerable groups); and
- Local businesses and universities

The stakeholders listed in Table IV.7 are the most prominent in the Project. Organizations or groups not listed can contact the Project Sponsor and provide their contact information to be informed about the Project.

People living in residential areas near the Project will be considered as potential Project affected people/population (PAP) in this Stakeholder Engagement Plan (SEP). These settlements are also listed in Table IV.7. Therefore, one of the objectives of the SEP is to effectively consult and share information with these groups and address their concerns.

Table IV.7 . Project's Stakeholders List

Level	Category	Organization / Entity
Internal	Appointed Company	Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş
	Contractor's Personnel	Information N/A
	Sub-contractors	Information N/A
National	Ministries and Relevant Authorities	Ministry of Transportation and Infrastructure
		General Directorate of Highways
		General Directorate of Infrastructure Investments
		General Directorate of Motorways Arrangement
		Ministry of Agriculture and Forestry
		General Directorate of State Hydraulic Works (DSİ)
		General Directorate of Forestry
		General Directorate of Meteorology
		Ministry of Environment, Urbanization and Climate Change
		General Directorate of Spatial Planning
		General Directorate of Environmental Management
		General Directorate of Preservation of Natural Heritage
		General Directorate of Land Registry and Cadaster
		Ministry of Culture and Tourism
		General Directorate of Cultural Heritage and Museums
		Ministry of Energy and Natural Resources
		General Directorate of Mineral Research and Exploration
		General Directorate of Electricity Generation Corporation (EUAS)
		General Directorate of Electricity Transmission Company (TEİAŞ)

Level	Category	Organization / Entity
		Ministry of Interior
		Gendarmerie General Command
		General Directorate of Security Affairs
		Ministry of Labor and Social Security
		General Directorate of Turkish Employment Agency (ISKUR)
		Ministry of Development
		Ministry of Defense
		Petroleum Pipeline Company (BOTAS)
		Prime Ministry's Disaster and Emergency Management Presidency (AFAD)
	NGOs	The Union of Chambers and Commodity Exchanges of Turkey (TOBB)
		World Wide Fund for Nature (WWF)
		Foundation for the Protection and Promotion of the Environment and Cultural Heritage (CEKUL)
		Environment Foundation of Turkey
		Turkish Environmental and Woodlands Protection Society (TURCEK)
		Union of Forestry Workers (ORMAN-IS)
		Union of Turkish Roads, Buildings and Construction Workers (YOL-IS)
		Confederation of Unions of Turkish Workers (TURK-IS)
		Union of Construction Industry Employers (INTES)
		The Turkish Foundation for Combating Erosion Reforestation and the Protection of Natural Habitats (TEMA)
		Nature Association
Regional	Governmental Authorities and Agencies	Ministry of Agriculture and Forestry Regional Directorate
		Ministry of Transportation and Infrastructure Regional Directorate of Highways
		Antalya Regional Directorate of Forestry
		Antalya Water and Sewerage Administration
		Antalya Provincial Directorate of Employment Agency
		Antalya Regional Directorate of Cultural Heritage Preservation Board
		General Directorate of Highways 13th Regional Directorate
	NGOs	Greenhouse Investors and Producers Association
		Eastern Mediterranean Research Association
		Mediterranean Protection Association
		Turkish Foresters Association Western Mediterranean Branch
		Mediterranean Association
		Archaeologists Association Western Mediterranean Branch
		Mediterranean Archaeology Association
		Mediterranean Conservation Society
Local	Governmental / Local Authorities and Agencies	Antalya Governorate
		Antalya Metropolitan Municipality
		Serik District Governorate

Level	Category	Organization / Entity
		Manavgat District Governorate
		Alanya District Governorate
		Serik District Municipality
		Manavgat District Municipality
		Alanya District Municipality
		Antalya Provincial Police Department
		Antalya Provincial Gendarmerie Command
		Antalya Provincial Family and Social Policies Directorate
		Antalya Provincial Culture and Tourism Directorate
		Antalya Agriculture and Forestry Directorate
		Antalya Provincial Food, Agriculture and Livestock Directorate
		Antalya Forestry Regional Directorate
		Antalya Provincial Industry and Trade Directorate
		Antalya Environment, Urbanization and Climate Change Provincial Directorate
		Antalya Water and Sewerage Administration
		Antalya Highways 13th Regional Directorate
		Antalya Provincial Directorate of National Education
	NGO's	Antalya Orchids and Biodiversity Protection Association (ANTOK, TÜRKİYE)
		Antalya Chamber of Commerce and Industry
		Turkish Agriculturalists Association Antalya Branch
		Turkish Nature Protection Association Antalya Branch
		Natural Resources and Biodiversity Protection Association
		Antalya Cultural Heritage Association
		Women's Social Life Research and Examination Association Antalya Branch
		Antalya Environment Platform
		Antalya Women's Cooperative
		Antalya Businesswomen's Association (ANTİKAD)
		Serik Chamber of Agriculture Presidency
		Serik Chamber of Tradesmen and Craftsmen Presidency
		S.S. Serik Boğazkent Women's Initiative Production and Business Cooperative
		Manavgat Women of Taurus Cooperative
		Turkish Agricultural Credit Cooperatives- Antalya
		TMMOB Chamber of City Planners Antalya Branch
		TMMOB Chamber of Agricultural Engineers Antalya Branch
		TMMOB Chamber of Forest Engineers Western Mediterranean Branch
		Alanya Sera-Bir Association
		Culture Routes Society
		Mediterranean Youth Association

Level	Category	Organization / Entity
		Antalya Industrialists and Business People Association
		Serik Youth Education Culture, Environment and Sport Association
	Residential Areas/Local Communities/Mukhtars/Potentially Project Affected People*	Antalya/Serik: Yukarıkocayatak, Aşağıkocayatak, Kayaburnu, Dikmen, Çandır, Aşağıçatma, Burmahancı, Merkez, Cumalı, Üründü, Kökez, Deniztepesi, and Sarıbalı neighborhoods,
		Antalya/Manavgat: Çakış, Sağırın, Taşağıl, Hocalar, Gündoğdu, Yavrudoğan Kalemler, Yeniköy, Şişeler, Evrenleryavşı, Dolbazlar, Yukarıışıklar, Sarılar, Hatipler, Gültepe, Ilıca, Side, Dikmen, Bucakşeyhler, Ulukapı, Aşağıışıklar, Demirciler, Karaöz, Aksaz, Hacıali, Cevizler, Sülek, Hacısalı, Hacıobası, Karacalar, Kızılot, Uzunlar, Çavuşköy, Kadılar, Örenşehir, Yalçıdibi, Odaönü, and Karakaya neighborhoods
		Antalya/Alanya: Alara, Çakallar, İncekum, Avsallar, Akdam, Türkler, Emişbeleni, Soğukpınar, Konaklı, Toslak, and Elikesik neighbourhoods,
		Users of the pasture located within the License Area of the Project*.
	Business Enterprises	Business enterprises located along the route
	Universities	Akdeniz University
		Alanya Alaaddin Keykubat University
		Antalya Bilim University
		Antalya Belek University
		Alanya University

IV.1.5 Field Study Report

The result of the field study is shown in the Table IV.8 . Processes like expropriation, public consultation meetings, working conditions will be advanced according to these results.

Table IV.8 The Result of the Field Study

District	Neighborhood	Findings About Vulnerable Groups
Serik	Merkez	There is no vulnerable group that does not receive support within the knowledge of the mukhtar. There is a high proportion of Syrian refugees/immigrants living in this neighborhood.
Manavgat	Taşagöl	Since the elderly population in the neighborhood is high and the elderly population in need of care and social assistance is the dominant group, a focus group study was conducted.
Manavgat	Kalemler	A focus group study was conducted since the female population of the neighborhood is dominated by divorced/divorced women. Generally, female heads of households and single women work or their children provide care for those who are unable to work. **It was identified that the house and adjacent agricultural land in the potential impact area of the highway project belongs to a physically disabled household head (male). This person stated that he lives on his own. He stated that there is a risk of losing 95% of his land due to expropriation. Parcels: 136/6, 136/7.
Manavgat	Ulukapı	Considering the neighborhood population, the female household head vulnerable group is in the majority. A vulnerable focus group interview was conducted with female participants.
Manavgat	Hacısalı	A focus group study was conducted in the neighborhood as the population of women who have lost their spouses/divorced and elderly people in need of care are the dominant group. It was informed that there are 3 people who will lose more than 20% of their total productive area in this neighborhood in the potential impact area of the motorway project. Two people have olive groves and one person has a glass greenhouse on the project route. It was informed that the land and residence of the female-headed household will probably be affected by the project.
Manavgat	Karakaya	Considering the neighborhood population, no dominant vulnerable group has been identified. It was informed that the route of the highway passes through the agricultural land and residence of the disabled person.
Alanya	Alara	There may be farmers who have lost more than 20% of their total productive area due to expropriation.
Alanya	Çakallar	There may be farmers who have lost more than 20% of their total productive area due to expropriation.
Alanya	Akdam	There may be farmers who have lost more than 20% of their total productive area due to expropriation. It was also informed that the land and residence of the female-headed household would likely be affected by the project.
Alanya	Toslak	There may be farmers who have lost more than 20% of their total productive area due to expropriation.
Alanya	Konaklı	There may be farmers who have lost more than 20% of their total productive area due to expropriation.

V. STAKEHOLDER ENGAGEMENT PLAN

This part of the SEP introduces the stakeholder engagement plan for the Project Company and gives a detailed description of the disclosure process and timeline. It then presents AAMP's methods and frequencies for stakeholder engagement, along with the proposed stakeholder engagement plan for the construction and operation phases.

V.1.1 Methods and Tools for Information Dissemination and Stakeholder Engagement

Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş. would use appropriate methods to disclose information about the planned Project, consult with stakeholders on potential benefits and risks of the planned project and potential adverse impact mitigation measures. Disclosure of relevant project information helps stakeholders better understand the risks, impacts and opportunities associated with the proposed projects. Information will be disclosed using methods, which will be suitable for various groups of stakeholders at all project implementation stages. For all disclosure attempts IFC PS1 and EPFI Principle 5 will be followed and by doing so, the Project will be kept in international standards. The relevant means for consultations with stakeholders are provided in Table V.1 and with possible timing in Table V.8 .

Different engagement methods are proposed and cover different stakeholder needs as stated below:

- Formal/ informal face-to-face meetings,
- Focus group meetings,
- One-on-one interviews,
- Digital communication tools (including web pages, correspondence by phone/email, WhatsApp, short message service),
- Written materials,
- Grievance mechanism,
- Social Media promotions.

A range of tools will be utilized for stakeholder engagement under this Project. Stakeholder engagement will continue to utilize these already established communication mechanisms, along with new mechanisms to be used as needed to ensure efficient and effective engagement throughout the lifetime of the Project. The project has and will continue to use the following methods for interacting with stakeholders:

Table V.1 Stakeholders / Purpose of Communication / Communication Methods

Stakeholders	Purpose for Communication	Type and Method of Communication
<p>Local communities/settlements in the area (See Table III.7 .)</p> <p>Farmers and owners of the agricultural fields around the motorway route</p> <p>Related local businesses near the motorway route</p> <p>Local Universities</p> <p>Vulnerable groups specified under the stakeholder identification section of this document which include as follows:</p> <ul style="list-style-type: none"> •Women head of household •Elderly people / older adult who need care and social assistance •Disabled (Physical / Mental) •Unemployed people (even though they are looking for a job) •Women who lost their spouses/divorced •Those who are homebound due to chronic illness •A child of school age who cannot go to school •Illiterate adult •Farmers who lost more than 20% of their total productive area due to expropriation •Seasonal agricultural workers •Refugee and Immigrant •People from different religions and sects •Ethnic minority groups •Yörüks 	<p>Providing information on the nature of the proposed Project, duration of the Project, potential environmental, social and economic impacts (positive and negative)</p> <p>Opportunities for the community to be actively involved in the project activities</p> <p>Mechanism / opportunities for suggestions and proposals</p> <p>Discussions on the potential adverse impacts</p>	<p>Information through the notice boards in public places,community liaison officers, project information desks, official website etc.</p> <p>Information about the prepared documents related to the project (ESIA report and SEP).</p> <p>Construction signs and warnings during the construction phase</p> <p>Group or individual meetings to identify impacts, agree and implement mitigation measures, project announcement (leaflets, etc.) as necessary</p>
Representatives of local communities (See Table III.7)	<p>Providing information on the nature of the Project, duration of the Project, potential environmental, social and economic impacts (positive and negative)</p> <p>To generate opportunities for the community to be actively involved in the project activities</p> <p>To create mechanisms and/or opportunities for suggestions and proposals</p> <p>To give rise to discussions on the potential adverse impacts</p>	<p>Official correspondence and meetings to provide information on project progress and issues that concern local communities and providing direct information</p> <p>Information through the notice boards in public places,community liaison officers, project information desks, official website etc.</p> <p>Information about the Project (ESIA, SEP, Management Plans)</p> <p>Formal/Informal Meetings with related parties</p>
<p>Interested national and local NGOs</p> <p>Other interested organizations will be added, as identified throughout the life of the Project</p>	<p>Providing information on the nature of the Project, duration of the Project, potential environmental, social and economic impacts (positive and negative)</p> <p>These organizations can potentially help to identify key issues pertaining to the local community (vulnerable groups) and the local environment</p>	<p>Information through the notice boards in public places,community liaison officers, project information desks, official website etc.</p> <p>Information about the Project (ESIA, SEP, Management Plans)</p> <p>Formal/Informal Meetings with related parties</p>
AFAD Local emergency services, fire brigades, utility owners and operators, local police, coast guard, health services	Inform relevant local authorities about Project and undertake official correspondence when needed	Official correspondence and meetings to prepare for and coordinate activities during operation.
Local and Central Governmental Institutions/Agencies	<p>Informing regarding Project progress and undertake official correspondence</p> <p>Getting necessary approvals/opinions during project execution</p>	Official correspondence and meetings, information disclosure and consultation reporting, monitoring, permit requests

Stakeholders	Purpose for Communication	Type and Method of Communication
General Directorate of Highways (KGM)	Providing information about the operation process of the Project, providing necessary information and reporting on relevant stakeholder engagement activities	Official correspondence and regular meetings to provide information on project progress and address issues that concern local communities and stakeholders Official correspondence and meetings, information disclosure and consultation reporting, monitoring, permit requests

**The website allows for anonymous communication.*

**During phone conversations, individuals will not be pressured to share their identity information; however, they will be informed that, in the absence of contact details, follow-up responses may not be provided.*

To ensure inclusive and equitable participation in the project lifecycle, the following gender-sensitive engagement measures will be implemented:

- **Targeted Outreach to Women:** Separate consultation meetings with women in each affected settlement, facilitated by female staff at every neighborhood in the Project area without exception from beginning of the construction. It is defined below at the Stakeholder Engagement Plan Section.
- **Accessible Meeting Formats:** The meetings are organized to start at 10.00 - 11.00 a.m. the most convenient time of the day for women,
- **Trusted Local Channels:** Utilize existing women's networks, cooperatives, health centers, and neighborhood heads to disseminate project-related information.
- **Language and Literacy Considerations:** Use visual materials and oral communication methods to accommodate illiterate and semi-literate women.
- **Safe Reporting Mechanisms:** Design grievance systems that allow confidential reporting of gender-based risks and ensure that women feel secure using these channels.
- The call center with the Grievance Mechanism will have a dedicated contact number for women and ensure that the staff listening to the complaint/request are women.
- **Continuous Feedback Loops:** Review and, where appropriate, integrate women's feedback into project decisions, and provide tailored updates to explain how their input has been addressed..

These measures aim to strengthen social inclusion and minimize unintended harms by addressing the gender-specific barriers that may prevent full participation and benefit sharing.

All neighborhood mukhtars (names of neighborhoods are given below) within the project impact area will be interviewed, active communication will be maintained throughout the construction phase, if the mukhtars approve, separate Whatsapp groups will be established for each district and active communication will be ensured.

Before the Public Participation Meetings, meetings will be held with the neighborhood headmen of each district in Alanya, Manavgat and Serik districts in Third Quarter of 2025, and information will be given about both the project and the public participation meetings.

The WhatsApp groups with Muhtars will be used for the public participation meetings, monitoring the complaint boxes and unexpected developments.

Neighborhoods:

Serik: Merkez, Cumalı, Yukarıkocayatak, Aşağıkocayatak, Burmahancı, Dikmen, Deniztepesi, Çandır, Aşağıçatma, Üründü, Kayaburnu, Kökez, Sarıabalı

Manavgat: Taşağıl, Kalemler, Ulukapı, Hacısali, Karakaya, Çakış, Sağırın, Hocalar, Gündoğdu, Yavrudoğan, Yeniköy, Şişeler, Evrenleryavşı, Dolbazlar, Yukarıışıkları, Sarılar, Hatipler, Gültepe, Ilica, Side, Dikmen, Bucakşeyhler, Aşağıışıklar, Demirciler, Karaöz, Aksaz, Cevizler, Sülek, Hacıobası, Karacalar, Kızılot, Uzunlar, Çavuşköy, Kadılar, Örenşehir, Yalçıdibi, Odaönü

Alanya: Akdam, Toslak, Alara, Çakallar, İncekum, Avsallar, Türkler, Emişbeleni, Soğukpınar, Konaklı, Elikesik

Additional Suggestions: Special communication channels may need to be developed for some disadvantaged groups. Different disadvantaged groups can be targeted through home visits or phone calls for individuals who cannot leave their homes; visually oriented leaflets and phone calls for illiterate individuals; leaflets and posters in different languages. The necessity of those special communication channels will be reevaluated after PCM in third quarter of 2025.

Specific Communication Strategies

Table V.2 Serik- Merkez Neighborhood

Category	Details
Target Groups	Local women, refugee women (especially Syrians), elderly residents, small-scale farmers
Identified Barriers and Risks	Women have limited access to formal consultation mechanisms, language barriers (Arabic speakers), time limitations due to domestic responsibilities, and discomfort attending mixed-gender meetings
Recommended Meeting Frequency	Every 3 months during the construction phase
Suggested Venue	S.S. Serik Boğazkent Women's Initiative Production and Business Cooperative or another trusted, central, and accessible space for women such as a municipal social center
Suggested Time	Weekday mornings (e.g., 10:00–11:00) or early afternoon for increased flexibility
Pre-Meeting Notification Method	Physical announcements (posters) at mukhtar offices, women's cooperative, and local grocery stores Bilingual printed materials (Turkish–Arabic) to reach refugee women Coordination with NGOs experienced in refugee engagement and women participation
Suggested Partners	S.S. Serik Boğazkent Women's Cooperative Serik Municipality's Women and Family Services Unit Local NGOs working with refugee or displaced populations (e.g. Refugees Association, SGDD-ASAM if active locally)

Table V.3 Manavgat- Taşağıl Neighborhood

Category	Details
Target Groups	Women, elderly, low-income households, informal agricultural workers
Identified Barriers and Risks	Strong gendered norms discourage women's active participation; women may perceive they are not allowed or not qualified to speak; informal workers lack official channels to express concerns
Recommended Meeting Frequency	Every 3 months, especially before and after major project milestones
Suggested Venue	Municipal social hall, women's training center (if any), or a local school building temporarily adapted for community meetings
Suggested Time	Mid-morning or early afternoon (when domestic obligations are lower)

Pre-Meeting Notification Methods	<p>Leaflets/posters in Turkish displayed at local market, health centers, mosque entrance, and mukhtar's Office</p> <p>Mosque loudspeaker announcements coordinated with the mukhtar</p> <p>Verbal reminders during market days or in front of local bakeries</p> <p>Tea/snack service and seating arrangement that reduces formality</p> <p>Any active women-led cooperatives or school-parent associations (if discovered later)</p>
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Table V.4 Manavgat- Kalemler and Hacısali Neighborhoods

Category	Details
Target Groups	Women, elderly, subsistence farmers, seasonal workers
Identified Barriers and Risks	GBV/SEAH risks due to incoming male construction workers Literacy barriers, especially among elderly women
Recommended Meeting Frequency	Every 3 months, especially in coordination with seasonal work cycles i.e. April-May
Proposed Meeting Venue(s)	Local school building, Open-air gathering space (market place)
Notification Methods (Pre-Meeting)	<ul style="list-style-type: none"> • Mosque loudspeaker announcements coordinated with the mukhtar • Printed flyers distributed at local markets and shops • Word-of-mouth through health workers or midwives • WhatsApp messages forwarded via local grocery shop owners
Suggested Partners	<ul style="list-style-type: none"> • Mukhtar's office • Local schoolteachers or volunteers • Community health workers or nurses • Religious leaders or imams (to increase neutrality and reach)

Table V.5 Alanya- Toslak and Konaklı Neighborhoods

Category	Details
Target Groups	Refugee/migrant women (Arabic speakers), seasonal workers, low-income families, elderly
Identified Barriers and Risks	<ul style="list-style-type: none"> • Language barrier (Arabic speakers with limited or no Turkish) • Limited mobility for women due to social norms and safety concerns • GBV and SEAH risks related to incoming male labor force
Recommended Meeting Frequency	Every 3 months; more frequently during peak construction or labor influx periods
Proposed Meeting Venue(s)	Local school building, Open-air gathering space (market place)
Notification Methods (Pre-Meeting)	<p>Bilingual flyers (Turkish–Arabic) distributed at grocery shops, mosque entrance, and via female market vendors</p> <p>Mosque loudspeaker announcements coordinated with the mukhtar</p> <p>In-person outreach by social workers, local women representatives, or trusted Arabic-speaking NGO staff</p> <p>Door-to-door info sharing by female CLO or female municipal outreach staff</p>
Suggested Partners	<ul style="list-style-type: none"> • Municipality's Women and Family Services • Local Arabic-speaking outreach volunteers • NGOs working with refugee/migrant communities (e.g. ASAM, IBC, CARE if present) • Local health unit or midwife, local female health staff network

Table V.6 Serik- Çandır, Aşağıkocayatak and Kayaburnu Neighborhoods

Category	Details
Target Groups	Yörük families (especially women), agricultural workers, elderly residents

Identified Barriers and Risks	<ul style="list-style-type: none"> • Seasonal mobility due to Yörük transhumance (yayla migration) • Low formal education and digital connectivity • Limited visibility of women in public consultation processes • Male-dominated decision-making structures • Safety concerns during yayla migration especially for women
Recommended Meeting Frequency	Twice per year: once before migration (spring) and once after return (early autumn) Also, every 3 months for stayers
Proposed Meeting Venue(s)	<ul style="list-style-type: none"> • Mukhtar's garden or shaded outdoor space • Mosque courtyard (off-prayer hours) • Nearby school building or mobile tent
Notification Methods (Pre-Meeting)	<ul style="list-style-type: none"> • Personal outreach via mukhtar and Yörük elders (aksakallar) • Announcements via mosque and village gatherings • Informal visits by community liaison team a few days before the meeting • Verbal invitation delivered through animal feed sellers or shepherds' network • Women-to-women verbal invitations via relatives
Suggested Partners	<ul style="list-style-type: none"> • Mukhtar and community elders • Local agricultural cooperatives • Nomadic family associations (if any) • Female outreach staff or locally respected women (e.g., imam's wife, elder women)

Among the vulnerable groups potentially affected by the Project are nomadic Yörük families, refugee/migrant women, the elderly, subsistence farmers, and seasonal workers, all of whom face various social, cultural, and economic barriers.

The seasonal migration patterns of the Yörük communities make it difficult for them to access information meetings, while women's participation in public consultation processes is often limited by traditional gender norms. Therefore, it is planned to hold at least two information meetings annually—before and after migration—and to organize these meetings in familiar community spaces such as the village head's (muhtar's) yard, mosque courtyards, or mobile tents. The notification process will be conducted through mukhtars, community elders, herder networks, and verbal communication among women. Additionally, mobile teams will visit highland settlements (yaylas), safe transportation support will be provided for women, and female CLO will be actively involved in the process.

For refugee and migrant women, the main barriers identified are language limitations, restricted mobility, and the risk of gender-based violence (GBV/SEAH). Meeting announcements will be made via bilingual Turkish-Arabic brochures, and face-to-face outreach will be carried out by trusted local Arabic-speaking actors. In addition, special consultation sessions for women will be organized, focus group discussions with interpreter support will be held, and mobile support teams and psychosocial assistance mechanisms will be introduced to address SEAH risks.

Among elderly individuals and low-income women, low literacy rates and traditional norms that discourage women from speaking publicly reduce active participation. Therefore, meetings are already planned to be held in the late morning or near noon, with tea/snack services provided to create an informal and welcoming atmosphere. In addition to brochure distribution, home visits will be conducted. Furthermore, to increase women's participation, neighborhood-based mini women's advisory groups will be established and regular women-only information sessions will be organized.

A common challenge for all these groups is the hesitancy and distrust related to accessing grievance and feedback mechanisms. Therefore, it is essential to enhance awareness of the Grievance Mechanism (GM), install locked complaint boxes to allow for anonymous submissions, and introduce female CLO members who will handle complaints submitted by women. Additionally, it is recommended to display simplified visual explanations of the grievance process, including the follow-up, resolution, and feedback loops, on community bulletin boards.

V.1.2 Operation Phase Community Engagement Plan (Post-Construction)

The stakeholder engagements developed during the construction process will be used effectively both in terms of public participation and authorized institutions, like NGOs and trade unions, and the communication and relations will continue to be used during the operation phase.

Table V.7 Operation Phase Focus Category

Category	Operation Phase Focus
Communication Objective	Ensure that vulnerable community members (women, elderly, children, pastoralist groups) are informed and can provide feedback on operational impacts such as traffic safety, access restrictions, and long-term social concerns.
Frequency of Communication	Twice per year (at minimum): - Spring (prior to tourism and migration season) - Autumn (after peak seasonal activity) Additional ad-hoc meetings in case of complaints or operational disruptions.
Communication Methods	<ul style="list-style-type: none"> • Posters and flyers at local hubs (muhtar, mosque, health centers) • WhatsApp messages and voice notes via community focal points • Public information sessions when relevant (e.g., new signage, access road changes) • Mobile info team visit once a year per settlement (if available)
Ongoing Risks / Key Topics	<ul style="list-style-type: none"> • Road safety (especially for children, elderly, school routes) • Access to agricultural land for women and small farmers • Yörük livestock migration coordination and crossing points • Street lighting needs in isolated or unlit areas • Gender-based violence (GBV) risks around roadside zones • Bus stop placements and pedestrian safety for women and elderly
Feedback & Grievance Channels	<ul style="list-style-type: none"> • Maintain grievance redress mechanism (GRM) • Add suggestion box in local gathering points (especially for women) • Use female CLO or trusted female intermediary for verbal reporting
Partners and Outreach Actors	<ul style="list-style-type: none"> • Mukhtar offices • School teachers and health workers • Local women's cooperatives • Elder women or pastoralist representatives • Municipal transport and safety units

V.2 Schedule and Timetable

The timing and form of activities for stakeholder engagement activities given in the previous section are detailed in Table V.8 below.

Table V.8 Proposed Stakeholder Engagement Program during Project Implementation

Activity	Method	Timing*
Field Study	Key informant interviews, focus group interviews, stakeholder meeting etc.	June 2024
Road Trip	Four Public Consultation Meetings alongside the motorway route (*, **), key informant interviews, etc.	Third Quarter 2025
Public Announcements	Social Media announcements, Website of AAMP Community liaison offices etc.	Whenever required
Disclosure of Environmental and Social Performance Reports	Website of AAMP	Annually
Activities with relevant stakeholders	Formal/Informal Meetings with representatives of relevant stakeholders	Whenever required
Reporting to KGM	Official correspondences, meetings and reports	Biannually

* Timing of the activities may change due to changes that may occur during the implementation of the Project.

** Shuttle vehicles will be arranged for the relevant residential areas in order to facilitate access to the upcoming Public Participation Meetings and to increase attendance rates.

VI. ROLES AND RESPONSIBILITIES

The anticipated activities in the SEP will be conducted and completed in operation phase by Project Company and KGM. In activities such as the grievance mechanism, Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş. will be responsible for following requests, suggestions and complaints, and in the upcoming process, AAOİAŞ will fulfil the requirements by being responsible for this mechanism in accordance with the IFC PS1, EPFI Principle 5 and Principle 6.

The implementation of this SEP will be conducted and monitored by Project Sponsor's Environmental and Social Manager who is responsible to appoint the Social Chef and the Environment and Social Deputy Manager to be responsible for the stakeholder engagement for the Project, implementation of this SEP and grievance management. The Social Chef and the Environment and Social Deputy Manager will perform the following functions:

- Information disclosure and obtaining feedback;
- Processing, managing and tracking grievances, including ensuring timely responses to and closure of grievances;
- Control over the implementation of the corrective actions to remedy grievances;
- Regular review and if necessary, update of the SEP and stakeholder engagement mechanism to ensure it is effective and reflects Project circumstances;
- Participation in discussion on responses and the resolution of disputes, and
- Assistance in the preparation of the Environmental and Social Performance Reports.

Depending on the complexity of issues, Project Sponsor's project management and experts of KGM may also be involved.

VII. GRIEVANCE MECHANISM

VII.1 Purpose of the Grievance Mechanism

The purpose of this mechanism is to establish a system for handling, evaluation and resolution of all kinds of internal and external grievances, concerns, queries and proposals of the affected communities and other stakeholders, such as construction workers, regarding the project activities. Please refer to Annex-3 for the Project Sponsor's confidentiality policy.

Managing grievances, including avoiding and minimizing them as well as effective handling, is an integral part of a sound stakeholder engagement strategy. Experience shows that significant numbers of grievances arise from misunderstandings, and that such grievances can be avoided, or their numbers reduced, through proactive and consistent engagement with communities. Engagement also helps anticipate and review community concerns to prevent them from escalating into grievances.

In accordance with IFC PS 2 and EPFI Principle 6, a process is established by which people who deem that they have been adversely affected by the Project during planning, construction or operation can bring grievances to the Project for consideration and, if required, resolution. A specific Project grievance mechanism (GM) is beneficial in addressing community and individual concerns and complaints before they escalate beyond control.

VII.2 Responsible Stakeholders

Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş. is responsible for implementing the grievance mechanism during the land preparation and construction and operation phases. AAÖİAŞ has to ensure that the grievance mechanism is implemented effectively.

Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş. Community Liaison Officers (CLOs), under the supervision of the Social Chief and Environment and Social Manager, are responsible for receiving and managing grievances, coordinating the actions to be taken for resolution, and keeping proper records. The Environment and Social Manager is responsible for compiling and reporting grievance-related information to the General Directorate of Highways (KGM).

VII.3 Grievance Mechanism

The main aim of the grievance mechanism is to assist in resolving complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. The GM is intended to serve as a mechanism to:

- Allow identification and impartial, timely and effective resolution of issues affecting the project,
- Strengthen accountability of the beneficiaries, including project-affected stakeholders, and,
- Provide channels for the stakeholders to provide feedback and raise concerns.

Workers who report violations such as forced labor, mistreatment, or wage exploitation within the scope of the Project shall be protected against any form of retaliation in line with IFC Performance Standard 2 and IFC's Good Practice Note: Addressing Risks of Retaliation Against Project Stakeholders (2021). To this end, the grievance mechanism is designed to allow for anonymous submissions. Workers will be able to submit grievances safely either through anonymous online forms available on the Project website or via locked complaint boxes installed at the worksite. During the grievance review process, the identity of the complainant will remain strictly confidential and will be stored in encrypted systems accessible only to designated Community Liaison Officers (CLOs), and will not be shared with other managers under any circumstances. Meetings related to sensitive issues will be conducted exclusively by authorized

social specialists, in private and secure settings, to ensure the safety and privacy of the complainant. Any adverse actions taken against a complainant following the submission of a grievance—such as reassignment, wage deduction, intimidation, or exclusion—will be treated as retaliation. In such cases, disciplinary proceedings will be initiated against the responsible individuals, and contracts with subcontractors may be suspended or terminated if necessary. The effectiveness of these procedures will be monitored by CLOs, and any potential retaliation incidents following grievance submissions will be tracked, documented, and reviewed through monthly reports.

VII.3.1 Grievance Mechanism at the National Level

Presidency's Communication Centre:

The Presidency's Communication Centre (CIMER) provides a centralized complaint system for Turkish citizens, legal persons and foreigners. CIMER only allow applications in Turkish. Contact details of CIMER are given in Table VII.1 .

Through CIMER, applicants can direct their requests directly to the relevant authorities. The requests submitted to CIMER are resolved within 30 days. If the applicants do not receive feedback within this period, they can re-submit their grievance to CIMER or elevate it to the Ombudsman Institution (www.ombudsman.gov.tr).

Table VII.1 Contact Details of CIMER

Webpage:	www.CIMER.gov.tr/ www.turkiye.gov.tr/
Call Centre (hotline):	150
Phone number:	+90 312 590 20 00
Fax number:	+90 0312 473 64 94
Official Letter/Petition:	Republic of Türkiye, Directorate of Communications T.C. Cumhurbaşkanlığı Külliyesi 06560 Beştepe/ Ankara
Individual Application:	Community relations desks at governorates, ministries and district governorates.

CIMER will be available to Project stakeholders as an alternative and well-known channel for conveying their Project-related grievances and feedback directly to state authorities.

Foreigners Communication Centre:

The Foreigners Communication Centre (YIMER) provides a centralized complaint system for foreigners. YIMER will be available to Project stakeholders as an alternative and well-known channel for conveying their Project-related grievances and feedback directly to state authorities. Contact details of YIMER are given in Table VII.2 .

Table VII.2 Contact Details of YIMER

Webpage:	www.YIMER.gov.tr
Email:	YIMER@goc.gov.tr
Call Centre (hotline):	157
Phone number:	+90 312 515 11 22
Fax number:	+90 312 920 06 09
Official Letter/Petition:	Republic of Türkiye General Directorate of Migration Management, Çamlica Mahallesi 122. Sokak No: 4 Yenimahalle/ Ankara
Individual Application:	Republic of Türkiye General Directorate of Migration Management

VII.3.2 Grievance Mechanism at the Project Level

External stakeholders can initiate the grievance/comment mechanism by using the following methods:

- Grievance/comment boxes and forms to be placed in public places including places commonly/ comfortably visited by women)
- Verbally during face-to-face meetings/visits to be held by the Project personnel (e.g. chiefs/ managers, CLOs)
- Telephone (the contact numbers that can be used to submit grievances/comments) of the CLO will be shared with the local communities in due course)
- E-mail (the e-mail address for the submittal of grievances/comments will be shared with the local communities in due course)
- Website (the contact number of the CLO will be shared with the local communities in due course)

On the website of Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş. there is a Contact page which is available in Turkish and English (<https://www.antalyaalanyaotoyolu.com.tr/>). The grievances/requests related to Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş. activities can be communicated through this page and the resolution process is followed. The page includes information on email, phone number and mailing address of Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş. Name e-mail address, telephone number and explanation/message/grievance could be entered in the online platform. Notification that the application has been received is made via e-mail address.

If the grievance/comment holder would like to fill out the form anonymously, the form (see VIII.1 and VIII.2) will allow the grievance/comment holder to file it without any personal contact information. For grievances/comments received verbally in person, the Project representatives will request the grievance/comment holder to fill in the form himself/herself by providing the required guidance, where necessary. If the grievance/comment holder wishes the form to be filled out by the Project representatives, they will fill the form on behalf of the grievance/comment holder. In such cases, the grievance/comment holder will be required to read the filled form and both the grievance/comment holder and the Project representative who filled in the form will be required to approve and sign the form. The Project representative will provide a copy of the filled form to the grievance/ comment holder stakeholder. The CLO will ensure that the grievance/comment forms are collected from the grievance/comment boxes weekly.

Grievance boxes and information boards were placed in most neighborhoods at mukhtar's offices and the installation is ongoing. An example of the installed grievance mechanism is shown in Figure 5.



Figure 5. The Grievance and Suggestion Box at Mukhtar's Office

For the internal grievance mechanism, the same boxes will be placed at construction sites at every camp area.

The office in Serik, where the address is written, also works as an information office: ORTA, BELEK CADDESİ, NO: 7, İÇ KAPI NO: 9 SERİK/ANTALYA. The temporary construction site can also be used as an information office.

Within the scope of the project, three Community Liaison Officers (CLOs) started to work within SPV. In addition, a call center has been established and can be reached at 0850 202 07 07.

The roles and responsibilities of Community Liaison Officers (CLOs) are presented in Table VII.3.

Table VII.3 Roles and Responsibilities of the Community Liaison Officer (CLO)

Role	Responsibilities
Community Liaison Officer (CLO)	<ul style="list-style-type: none"> • Inform the public about the scope, progress, and potential impacts of the Project. • Organize and facilitate regular community meetings, focus group discussions, and engagement forums. • Maintain open communication channels with project-affected persons (PAPs), community leaders, and local institutions. • Develop and distribute communication materials tailored to various community audiences. • Ensure that all internal and external complaints, including those under the Stakeholder Engagement Plan (SEP), are managed in line with the Grievance Mechanism (GM). • Log, track, and resolve complaints and appeals in a timely and respectful manner. • • • Provide regular training to site personnel during the construction phase. • • Conduct regular internal audits and report non-conformities. • Ensure that non-conformities are recorded and promptly addressed. • Participate in the development and follow-up of corrective and/or improvement actions. • • Report on the implementation performance of this Plan. • Support the review and update processes of this Plan. • Ensure that lessons learned and field experiences are reflected in plan revisions and training updates. • Collaborate with Health & Safety (H&S) and Social teams to address cross-cutting issues. • • • Facilitate resolution of community disputes or concerns related to project activities. • Assess how vulnerable or marginalized groups may be affected by the Project. • Propose mitigation measures or tailored engagement approaches for at-risk or underrepresented populations. • Ensure equitable participation in consultation processes, particularly for women, youth, elders, and people with disabilities. • Support the monitoring and recording of the implementation of the social related issues, including activities carried out by subcontractors. • Support the evaluation of the SEP's implementation performance and community feedback • Contribute to regular internal audits and the reporting of non-conformities. • Ensure that relevant non-conformities are recorded and addressed immediately.

Role	Responsibilities
	<ul style="list-style-type: none"> •Participate in the development of corrective and/or improvement actions and support their follow-up. •Support the periodic review and update of the SEP and related procedures in coordination with the E&S Manager. •Provide input to lessons learned from engagement outcomes and grievance trends. •Maintain up-to-date records of all stakeholder meetings, grievances, resolutions, and community commitments. •Submit routine reports to the Social Chief and/or E&S Manager summarizing community feedback, grievance status, and engagement Milestones. •Ensure confidentiality and proper data handling, especially for sensitive community issues.
Social Chief	<ul style="list-style-type: none"> •Supervise and mentor CLOs, ensuring their work aligns with project priorities and stakeholder engagement strategy. •Develop and implement work plans and schedules for the CLO team. •Ensure consistent messaging, processes, and reporting methods across all field teams. •Conduct regular team meetings to review community issues, grievances, engagement outcomes, and field updates. •Lead the implementation of the Stakeholder Engagement Plan (SEP) and ensure it reflects community realities. •Oversee the planning and execution of community consultations, public meetings, and disclosure activities. •Ensure that engagement activities are inclusive of vulnerable and marginalized groups. •Build and maintain positive, trust-based relationships with local communities, leaders, and institutions. •Supervise the effective functioning of the grievance mechanism (GM) at community and project levels. •Ensure all grievances are recorded, processed, and resolved in a timely and transparent manner. •Analyse grievance trends and escalate systemic issues to the E&S Manager. •Contribute to the continuous improvement of the GRM process based on community feedback and internal review. •Monitor the performance of social engagement activities and their compliance with SEP objectives. •Ensure accurate, timely, and complete reporting of CLO activities, stakeholder interactions, and grievance outcomes. •Review and validate weekly/monthly reports from CLOs and prepare consolidated updates for senior management. •Ensure all engagement activities meet national regulations and international standards (e.g., IFC PS, EBRD PR, Equator Principles). •Identify training needs and deliver or coordinate training for CLOs on stakeholder engagement, conflict resolution, and field documentation. •Promote professional development and capacity building within the social team. •Train subcontractors and relevant staff on community interaction protocols and grievance management. •Contribute to the development, review, and periodic updating of the SEP and related social management plans. •Ensure CLOs support the implementation and documentation of these plans at the field level. •Support the integration of lessons learned into updated plans and engagement strategies. •Coordinate with the E&S Manager, E&S Specialists, H&S, legal, and construction teams to address community-related impacts. •Support alignment between community concerns and project execution through proactive communication with technical departments. •Contribute social performance inputs to reports for lenders, regulators, and corporate leadership.

The Community Liaison Officers (CLOs) appointed within the Project hold undergraduate and/or postgraduate degrees in disciplines such as sociology, social policy, public relations, and other social sciences. With both strong academic backgrounds and practical experience, they significantly contribute to the effective implementation of environmental and social management processes. In total, three experts are expected to undertake the role of CLOs within the scope of the Project. The CLOs work under the supervision of the Social Chief, who has extensive experience in stakeholder engagement, coordination with local NGOs and public institutions, gender-sensitive approaches, and the implementation of social development and awareness-raising initiatives in line with national legislation and IFC Performance Standards.

In addition to meeting the above-mentioned qualifications, the current CLOs also possess practical knowledge of social performance management in accordance with World Bank and IFC standards. These experts play an active role in areas such as social impact management, establishment and monitoring of grievance mechanisms, stakeholder engagement processes, gender-sensitive approaches, field research, reporting, and communication. Their key competencies include reporting, problem-solving, leadership, data processing with SPSS, engaging with communities, expertise in child and women's rights programs, and compliance with relevant national and international regulations.

Furthermore, the experts have completed various training and certification programs in areas such as "Community Engagement and Gender-Based Violence Prevention," "Stakeholder Engagement," "Digital Literacy," "Family Counseling," "NLP," and "Play Therapy," thereby enhancing their professional skill sets.

VII.3.3 Gender-Sensitive Accessibility to the Grievance Mechanism

To ensure equitable access to the Grievance Mechanism (GM), gender-specific challenges have been identified across affected communities in Serik, Manavgat, and Alanya. Women, especially those in rural or conservative settings, often face social, mobility, and communication barriers that limit their ability to file formal complaints.

Barriers identified include:

- Limited mobility due to unpaid care work and household responsibilities
- Lack of awareness of complaint channels, particularly among refugee or elderly women
- Discomfort speaking in male-dominated spaces or to male project staff
- Low literacy or digital skills
- Cultural norms discouraging women from voicing dissatisfaction publicly

Table VII.4 Gender-Sensitive Accessibility to the Grievance Mechanism

Measure	Description
Female CLOs or trusted intermediaries	Women will have the option to submit grievances through female liaison officers or locally respected women (e.g., women cooperative members or mukhtar's wife)
Anonymous feedback channels	Lockable complaint boxes in women-accessed locations (e.g., cooperatives, health centers) and verbal relay via trusted mediators
Outreach using local networks	Use of female-focused WhatsApp groups and word-of-mouth messaging to raise awareness of the GM
Language support	Bilingual grievance forms (Turkish and Arabic) for refugee women in areas like Serik and Toslak
Verbal grievance intake	Women will be allowed to submit complaints orally, especially in low-literacy or elderly populations (e.g. Kalemli, Hacısali)
Culturally appropriate meeting spaces	Women-only consultation sessions where grievances and concerns can be voiced safely and privately
Communication Line	A separate hotline will be set up for women, and it will be explained through CDCs and leaflets that the person answering the phone is a woman and will listen to complaints anonymously, without prejudice or comment, and that complaints will be recorded according to the request

Table VII.5 Procedural Steps of Grievance Mechanism

Step	Description of Process	Time Frame	Responsibility
GM implementation structure	There exist two Grievance Mechanism at the National Level: •Presidency's Communication Centre and •Foreigners Communication Centre	-	Presidency's Communication Centre, and Foreigners Communication Centre and related authorities, CLO
Grievance uptake	Grievances can be submitted via the following channels: •Telephone •Verbally •E-mail •Grievance/comment boxes •Letter to Grievance focal points at local facilities Complaint form to be logged via any of the above channels •Walk-ins may register a complaint in a grievance logbook at a facility or suggestion box Anonymous Grievances can be submitted via the following channels: •Telephone •Letter to Grievance focal points at local facilities •Suggestion box	-	CLO
Sorting, processing	Any complaint received is forwarded to Environment and Social Manager and SPV General Manager, Logged in the Grievance Log, and categorized according to the complaint types ¹ : If the complaint is assessed to be out of the scope of the Grievance Mechanism, a grievant will be notified through the desired communication method and an alternative mode of solution will be	Within 3 business days of receipt	CLO

¹ Level 1 Complaint: A complaint that is isolated or 'one-off' (within a given reporting period - one year) and essentially local in nature.

Note: Some one-off complaints may be significant enough to be assessed as a Level 3 complaint e.g., when a national or international law is broken (see Level 3).

Level 2 Complaint: A complaint that is widespread and repeated (e.g., noise from the facilities, dust, etc.).

Level 3 Complaint: A one-off complaint, or one which is widespread and/or repeated that, in addition, has resulted in a serious breach of the Project's policies or National law and/or has led to negative national/international media attention, or is judged to have the potential to generate negative comment from the media or other key stakeholders (e.g., inadequate waste management).

Step	Description of Process	Time Frame	Responsibility
	suggested.		
Acknowledgement and follow-up	Receipt of the grievance is acknowledged to the complainant by CLO through a personal meeting, phone call or letter as appropriate, within a target of 3 business days after submission. If the grievance is not well understood or if additional information is required, clarification will be sought from the complainant.	Within 3 business days of receipt	CLO
Verification, investigation, action	Investigation of the complaint is led by Environment and Social Manager and SPV General Manager. The SPV General Manager is notified of Level 1, 2 or 3 grievances. The Social Chief, as appropriate, support the Environment and Social Manager in deciding who should deal with the grievance and determines whether additional support for the response is necessary. A proposed resolution is formulated by Social Chief, as appropriate, supports the Environment and Social Manager and is communicated to the complainant by CLO through the grievance/comment close-out form.	Responses within 60 business days of receipt	SPV General Manager, E&S Manager, Social Chief, Community Liaison Officers
Monitoring and evaluation	Data on complaints are collected in a database and reported to SPV General Manager, Environment and Social Manager and AAOİAŞ HQ every three months	Quarterly	CLO
Provision of feedback	Feedback from complainants regarding their satisfaction with complaint resolution is collected by CLO through phone calls or face-to-face interviews.	15 business days after the implementation of the resolution	CLO

Once all possible means to resolve the complaint have been proposed and if the complainant is still not satisfied, then they should be advised of their right to legal recourse including the right of petition, right to information and appeal to the ombudsperson (constitution, article 74) and right to constitutional complaint (constitution, article 148).

In addition to the project's GM for its internal and external stakeholders, EP 6: Grievance Mechanism requires the establishment of a Workers' Grievance Mechanism (WGM) for the project workers. The project workers will use the WGM to convey their concerns or suggestions regarding their working conditions and workplace. The Worker Grievance Mechanism is defined as the mechanism that receives complaints from Project employees (including both direct and indirect employees).

Any comments or concerns will be brought to the Company's attention verbally or in writing (by post or e-mail) or by filling in a grievance form. The grievance form will be made available on the Company website, at the Project site, at the mukhtar's office, alongside a description of the grievance mechanism. All grievances will be:

- Acknowledged within seven days after receipt;
- Responded no later than within 60 business days after receipt, and
- Specifically, nominated and trained members of staff will record grievance information in a grievance register. The information in the grievance register will include Stakeholder name and contact details and details of the grievance and how and when it was submitted, acknowledged, responded to and closed out.

Individuals can request the right to have their names kept confidential, and this mechanism does not preclude the right for stakeholders to process grievances through other judicial means.

- Step 1: Receipt of grievance and registering of grievance (3 business days),
- Step 2: Assessment,

- Step 3: Acknowledgement of grievance (acknowledged within 3 business days after receipt),
- Step 4: Investigation and resolution of grievance,
- Step 5: Closure; and (60 business days)
- Step 6: Outcome of the corrective action (15 business days after completion).

Appeals Committee

In case the complainants are not satisfied with the decision of Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş and/or EPC on their complaints, they can refer to the Appeals Committee via Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş social impact team.

Appeals Committee consisting of Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş management teams is responsible for ensuring grievance mechanism is effectively managed. Furthermore, the committee will directly investigate and respond grievances as well as grievances that are not closed when complainant refuses the corrective actions, or the actions are not closed on time.

The mandate of the Appeals Committee covers considering complaints on the issues listed below (excluding those related with Labor Law and Expropriation Law):

- Unsolved grievance related to damage to environment,
- Unsolved grievance related to damage to public assets and infrastructure,
- Unsolved grievance related to damage to private assets (land, crops, houses etc.),
- Unsolved grievance related to impacts on livelihood.

The Appeals Committee carries out the following tasks:

- Meeting at least once a month or more often depending upon the existence of unresolved disputes,
- Reviewing the complaints by hearing both complainants and LİMAK and/or EPC
- Investigating the complaints in accordance with project requirements, LİMAK Policies, legal framework and referring to relevant expertise where required,
- Preparing an evaluation report based on the inquiries,
- Making a proposal on resolution of the disputes between parties.

The decision of the Appeals Committee is not binding and if parties do not agree on the Appeals Committee proposal, they still have the opportunity to either negotiate or litigate.

The Appeals Committee consists of the following members:

- SPV General Manager
- Health and Safety Manager
- Environment and Social Manager
- Expropriation Manager
- Social Chief
- Community Liaison Officer
- Matter Expert, if required
- Relevant NGO officer or village leaders

The grievance mechanism will be widely announced to the public with stakeholder meetings held for project affected communities. Additional meetings will be organized to target women PAPs and vulnerable groups for sharing information on grievance mechanism that also allows anonymous grievances. The grievances will be reviewed by the team according to the Project human rights and grievance mechanism.

The relationships developed through effective stakeholder engagement activities and the involvement of local organizations in the appeals committee will reduce concerns about objectivity and ensure a more transparent process for the grievance mechanism and the right to appeal.

Rules and Procedures of the Appeals Committee

1. Purpose and Scope

This manual outlines the procedures and operating rules of the Appeals Committee established under the grievance mechanism of the Antalya-Alanya Motorway Project. The purpose of the Appeals Committee is to ensure an effective, transparent, and fair review of grievances that remain unresolved or are not accepted by the complainant after the initial resolution process.

The Committee is responsible for investigating grievances that fall under its mandate, ensuring alignment with project policies, applicable legislation, and international environmental and social standards.

The Appeals Committee shall consider complaints unresolved by Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş and/or EPC, specifically on the following issues (excluding matters under Labor Law or Expropriation Law):

- Environmental damage
- Damage to public assets and infrastructure
- Damage to private property (land, crops, houses, etc.)
- Impacts on livelihood

2. Committee Structure and Responsibilities

The Appeals Committee includes the following members:

- SPV General Manager (Chair)
- Health and Safety Manager
- Environment and Social Manager
- Expropriation Manager
- Social Chief
- Community Liaison Officer
- Subject Matter Expert (as needed)
- Representative of local NGOs or village leadership

The Committee may invite additional stakeholders or technical advisors as needed, based on the nature of the grievance under review.

The Committee is responsible for the following tasks:

- Reviewing unresolved or escalated grievances submitted via the Social Impact Team.
- Ensuring complainants are heard fairly and respectfully.
- Conducting investigations in line with project requirements, legal frameworks, and LİMAK Group's environmental and social policies.
- Seeking input from technical experts and community representatives where appropriate.
- Developing reasoned proposals to resolve disputes.
- Preparing detailed evaluation reports for each reviewed grievance.

3. Implementation

- Appeals must be submitted to the CLOs, which will forward them to the Appeals Committee Secretariat.
- Appeals are logged, assigned a case number, and acknowledged within 5 working days.
- The Committee shall meet at least once a month, or more frequently if required by the number or urgency of unresolved grievances.
- The Committee verifies the grievance falls under its mandate.
- Both the complainant and the project/EPC representatives are given the opportunity to present their perspectives.
- The Committee may conduct site visits, consult experts, and review relevant documentation.
- Committee members engage in internal review processes in a confidential manner and aim to reach decisions through consensus wherever possible."
- A written resolution proposal is shared with both parties within three (3) business days following the Committee meeting.
- The grievance case documentation, including the Committee's findings, rationale, and resolution recommendations, is securely archived and integrated into the project's grievance monitoring and reporting system.
- All Committee members shall maintain strict confidentiality.
- Any member with a potential conflict of interest must recuse themselves from the specific case.
- The effectiveness of the Appeals Committee and its procedures will be reviewed annually.
- Lessons learned will be incorporated into future updates of this manual and SEP revisions.

Grievances Related GBV/SH/SEA

To properly address SEA/SH risks, the GM will be in place prior to contractors mobilizing. For GBV- and particularly SEA/SH-complaints, there are risks of stigmatization, rejection and reprisals against complainant. This creates and reinforces a culture of silence so complainant may be reticent to approach the project directly. To enable women to safely access the GM, multiple channels through which complaints will be registered in a safe and confidential manner will be enabled. These channels will be designed to respect privacy, ensure accessibility, and allow for anonymous reporting, using approaches such as - but not limited to - confidential verbal reporting, written submissions, or digital tools, depending on the local context and available resources. Anonymous submissions are accepted and processed with the same level of seriousness.

The Social Chef and CLO will to be trained on how to collect SEA/SH cases confidentially and empathetically (with no judgement). Where possible, at least one female CLO shall be available to receive SEA/SH-related complaints.

Projects will have multiple complaint channels. No identifiable information on the survivor will be stored in the GM and all data related to GBV/SH/SEA grievances will be handled and stored securely in accordance with applicable data protection laws and the AAOİAŞ's confidentiality policies (Please refer to Annex-3 for the Project Sponsor's confidentiality policy.). The GM will not ask for, or record, information on more than the following related to the SEA/SH allegation:

- The nature of the complaint (what the complainant says in her/his own words without direct questioning);
- If, to the best of the survivor's knowledge, the perpetrator was associated with the project;
- If possible, the age and sex of the survivor; and
- If possible, information on whether the survivor was referred to services.

In line with IFC's Good Practice Note: Addressing Risks of Retaliation Against Project Stakeholders (2021), the information in the GM will be confidential-especially when related to the identity of the complainants or witnesses. Any form of retaliation against individuals submitting GBV/SH/SEA grievances is strictly prohibited. Such actions may result in disciplinary measures for company personnel and, where applicable, appropriate contractual follow-up or escalation with third-party actors, including contractors and service providers.

Complainants will be informed about and referred to appropriate support services, such as medical care, psychosocial support, legal aid, or protection services. AAOİAŞ will maintain an up-to-date referral list of local service providers for this purpose.

GBV/SH/SEA grievances will be acknowledged within 3 business days and resolved as quickly as possible, with sensitivity to the emotional and physical needs of the Complainants. Complainants shall be informed of outcomes or steps taken, as appropriate and with their consent.

All GBV/SH/SEA grievances will be documented separately and securely, with access limited to authorized personnel. Non-identifiable summary data may be used for monitoring, evaluation, and reporting purposes only.

VII.4 MONITORING AND REPORTING

The SEP is a living document that will be updated periodically (at least once every six months) to document consultations conducted, issues raised, and actions taken. It will also include lessons learned, any modifications to the consultation process, and a schedule for ongoing future interaction.

VII.5 Internal Monitoring

The Project Sponsor will monitor the participation of the stakeholders in the planned engagement activities. Through the evaluation of outcomes and the effect of engagement, LİMAK intends to obtain regular feedback from stakeholders and to learn if the planned outcomes are achieved or if there is a need to change the approach.

Throughout the Project, Project Sponsor will communicate with stakeholders and inform them about any significant issues, such as changes in the Project schedule.

Monthly summaries/reports of grievances, queries, and related incidents, together with the implementation status of corrective/preventive actions, will be prepared by the Environmental and Social Manager. The monthly summaries/reports will be a means to assess both the number and nature of complaints (if any), along with the Project Sponsor's ability to address complaints in a timely and effective manner.

During the operation phase, the Environmental and Social Manager will also prepare quarterly overall performance reports.

VII.6 External Monitoring

In addition to internal monitoring, external monitoring activities will be carried out quarterly- in the construction phase and biannually during the operation phase of the project by external/independent third-party experts (ESAP monitoring experts) to verify environmental and social monitoring information and perform monitoring services.

As part of the external monitoring process, a final evaluation will be conducted to determine whether the implementation of the ESMS/ESMP complies with national environmental laws, international agreements, protocols, environmental and social standards such as the Equator Principles and IFC Policy (2012) and related Performance Standards on Environmental and Social Sustainability applicable to the Antalya-Alanya Motorway Project.

Besides, local authorities and the Ministry of Environment, Urbanization and Climate Change (MoEU) have the authority to execute monitoring and inspection activities to follow up on the conformity of the Project activities with the environmental requirements as per the relevant legislation.

VII.7 Phase-Differentiated Monitoring

Monitoring requirements differ between the **construction** and **operation** phases due to the evolving nature of impacts and stakeholder interactions.

During Construction Phase:

- **Indicators:**
 - Number and frequency of community consultations held
 - Percentage of women, elderly, and vulnerable groups reached
 - Number of grievances received and resolved within defined timelines
 - Occupational health and safety incidents reported and addressed
 - Number of disruptions to access/mobility and mitigations implemented
- **Methods:**
 - Site-level monitoring by social and environmental officers
 - Community feedback sessions and mobile grievance intake
 - Weekly reporting by contractors

During Operation Phase:

- **Indicators:**
 - Road safety incident reports and follow-up actions
 - Long-term noise and air quality measurements
 - Accessibility improvements for vulnerable groups (e.g., crossings, lighting)
 - Continued functionality of grievance mechanism (response rate, satisfaction)
 - Periodic satisfaction surveys with local residents and road users
- **Methods:**
 - Bi-annual monitoring reports submitted to financing institutions
 - Independent audits and third-party verifications (if required)
 - Coordination with local authorities and CSOs for long-term oversight

VII.7.1.1 Vulnerability-Focused Monitoring

Special attention will be given to tracking how the project affects vulnerable groups identified in this HRA:

- Sex- and age-disaggregated data will be maintained for all engagement and grievance records.
- Gender-based violence (GBV) indicators will be tracked in coordination with local NGOs.
- Mobility/access concerns for the elderly and disabled will be assessed during site visits.

VII.7.1.2 Reporting and Disclosure

- Monitoring results will be disclosed in an accessible format (e.g., summary brochures, radio announcements, community meetings).
- Reports will be prepared in Turkish and, where relevant, simplified formats or visualized to ensure comprehension by illiterate or semi-literate populations.
- An annual Stakeholder Monitoring Summary will be shared with local authorities, community representatives, and the public.

This structured and adaptive monitoring and reporting system ensures transparency, learning, and responsiveness throughout the project duration.

VIII. ANNEXES

VIII.1 External Grievance Form

Doküman <i>Document:</i>		DIŞ ŞİKÂyet/ÖNERİ TAKİP VERİ TABANI (EXTERNAL GRIEVANCE/SUGGESTION REGISTER)
Son <i>Date of Last Revision</i>	Revizyon	Tarihi
Son Revizyonu Yapan Kişi <i>Person who made the Last Revision</i>		
<div style="writing-mode: vertical-rl; transform: rotate(180deg);"> A. Genel Bilgiler <i>General</i> </div>	Ref. No.	
	Şikayet/Geri Bildirimin Yapıldığı Tarih <i>Date of Grievance/ Feedback Filed by the Grievance/ Feedback Holder</i>	
	Şikayet/Geri Bildirimin Şirkete Ulaştığı ve Veritabanına İşlendiği Tarih (Farklı ise) <i>Date of Grievance/ Feedback Lodged to the Company Database (if different)</i>	
	Şikayet/Geri Bildirimi Alan Proje Personelinin İsmi <i>Name of the Project Personnel who Received the Grievance/ Feedback</i>	
	Şikayet/Geri Bildirimi Alan Proje Personelinin Çalıştığı Şirket <i>Company of the Project Personnel who Received the Grievance/ Feedback</i>	
	Şikayet/Geri Bildirimi Şirket Veritabanına Kaydeden Personelin İsmi <i>Name of the Project Personnel who Registered the Grievance/ Feedback</i>	

Doküman Document:		DIŞ ŞİKÂYET/ÖNERİ TAKİP VERİ TABANI (EXTERNAL GRIEVANCE/SUGGESTION REGISTER)
Son Date of Last Revision	Revizyon	Tarihi
Son Revizyonu Yapan Kişi Person who made the Last Revision		
	in the Company Database	
	Şikayet/Geri Bildirim Sahibinin Şikayet/Geri Bildirimin Alındığına Dair Bilgilendirildiği Tarih Date of Acknowledgement and Notification of the Grievance/Feedback Holder	
	Şikayet/Geri Bildirimin Alınış Şekli (Yazılı ya da Sözlü, istişareler sırasında) Method of Grievance/Feedback Receipt (Written or Oral, through consultations)	
	Şikayet/Geri Bildirim Sahibinin İsmi (isteğe bağlı) Name of Stakeholder who Lodged the Grievance/ Feedback (optional)	
	Şikayet/Geri Bildirim Sahibinin Nereden Geldiği (Yerleşim, Şirket, vb.) Origin of Stakeholder who Lodged the Grievance/Feedback (Settlement, Company, etc.)	
B. Şikayet/Geri Bildirim ile ilgili Bilgileri Information on the Grievance/Feedback	Geri Bildirimin Tipi (Şikayet, Yorum, İstek, Soru) Type of Feedback (Grievance, Comment, Recommendation, Request, Question)	
	Geri Bildirimin Konusu Subject of the Feedback	
	Şikayet/Geri Bildirimin Detaylı Tarifi Detailed Description of the Grievance/Feedback	
	Şikayetin İlgili Olduğu Taraf (Şirket, Yüklenici, Altyüklenici, Üçüncü Taraf) Relevant to Project Company, Contractor, Subcontractor, Third-party, etc.	
	Aksiyon Olup Olmadığı Follow-up Action Required	
Aksiyonlar (Bu kısım, O Kolonu'na verilen cevabın "Evet" olması halinde doldurulacaktır) Follow-up Actions (to be filled if the answer to Column B is "Yes")	Alınacak Düzeltici Aksiyon Corrective Action to be taken	
	Aksiyondan Sorumlu Taraf Responsible Party for the Action	
	Aksiyonun Alınmasından Sorumlu Departman Responsible Department (for implementation)	

Doküman Document:		DIŞ ŞİKÂyet/ÖNERİ TAKİP VERİ TABANI (EXTERNAL GRIEVANCE/SUGGESTION REGISTER)
Son Date of Last Revision	Revizyon	Tarihi
Son Revizyonu Yapan Kişi Person who made the Last Revision		
	Aksiyonun Alınmasından Sorumlu Kişi Name of the Responsible Person for the Action	
	Aksiyonun Alınmasından Sorumlu Kişinin Pozisyonu Position of the Responsible Person for the Action	
	Aksiyonun Tamamlanacağı Tarihi Due Date for Action	
	Aksiyonun Durumu Action Status	
	Aksiyonun Tamamlandığı Tarihi Completion Date for Action	
	İlgili / Destekleyici Dokümanlar Related / Supplementary Documents	
Closure D. Şikâyetin/Geri Bildirimin Kapatılması / Grievance/Feedback	Şikâyet/Geri Bildirimin Durumu Status of the Grievance/Feedback	
	Şikâyet/Geri Bildirimin Kapatıldığını Teyit Eden Proje Personeli Name of the Project Personnel who Confirmed Closure of the Grievance/Feedback in the Database	
	Paydaş Şikâyet/Geri Bildirimin Kapatıldığına Dair Bilgilendirildiği Tarih Date the Stakeholder Notified about the Closed Status	
	Toplam Şikâyet/Geri Bildirim Kapanış Süresi Total Feedback/Grievance Closure Duration	
	Paydaş Şikâyet/Geri Bildirimin Kapatılmasından Memnun Mu? Is the Stakeholder Satisfied about the Closure of the Grievance/Feedback?	
	Kapatılmadı ise Nedeni Reason for Overdue Closure	
	Kapanış ile İlgili / Destekleyici Dokümanlar Related / Supplementary Documents for Closure	

VIII.2 Internal Grievance Form

Doküman Document:		İÇ ŞİKÂyet/ÖNERİ TAKİP VERİ TABANI (INTERNAL GRIEVANCE/SUGGESTION REGISTER)
Son <i>Date of Last Revision</i>	Revizyon	Tarihi
Son Revizyonu Yapan Kişi <i>Person who made the Last Revision</i>		
Information	Ref. No.	
	Şikayet/Geri Bildirimin Yapıldığı Tarih <i>Date of Grievance/ Feedback Filed by the Grievance/ Feedback Holder</i>	
	Şikayet/Geri Bildirimin Şirkete Ulaştığı ve Veritabanına İşlendiği Tarih (Farklı ise) <i>Date of Grievance/ Feedback Lodged to the Company Database (if different)</i>	
	Şikayet/Geri Bildirimi Alan Proje Personelinin İsmi <i>Name of the Project Personnel who Received the Grievance/ Feedback</i>	
	Şikayet/Geri Bildirimi Alan Proje Personelinin Çalıştığı Şirket <i>Company of the Project Personnel who Received the Grievance/ Feedback</i>	
	Şikayet/Geri Bildirimi Şirket Veritabanına Kaydeden Personelin İsmi <i>Name of the Project Personnel who Registered the Grievance/ Feedback in the Company Database</i>	
	Şikayet/Geri Bildirim Sahibinin Şikayet/Geri Bildirimin Alındığına Dair Bilgilendirildiği Tarih <i>Date of Acknowledgement and Notification of the Grievance/Feedback Holder</i>	
	Şikayet/Geri Bildirimin Alınış Şekli (Yazılı ya da Sözlü, istişareler sırasında) <i>Method of Grievance/Feedback Receipt (Written or Oral, through consultations)</i>	
	Şikayet/Geri Bildirim Sahibinin İsmi (isteğe bağlı) <i>Name of Stakeholder who Lodged the Grievance/ Feedback (optional)</i>	
	A. Genel Bilgiler <i>General</i>	Şikayet/Geri Bildirim Sahibinin Nereden Geldiği (Yerleşim, Şirket, vb.) <i>Origin of Stakeholder who Lodged the Grievance/Feedback (Settlement, Company, etc.)</i>

Doküman Document:		İÇ ŞİKÂyet/ÖNERİ TAKİP VERİ TABANI (INTERNAL GRIEVANCE/SUGGESTION REGISTER)
Son Date of Last Revision	Revizyon	Tarihi
Son Revizyonu Yapan Kişi Person who made the Last Revision		
B. Şikâyet/Geri Bildirim ile ilgili Bilgileri Information on the Grievance/Feedback	Geri Bildirimin Tipi (Şikâyet, Yorum, İstek, Soru) Type of Feedback (Grievance, Comment, Recommendation, Request, Question)	
	Geri Bildirimin Konusu Subject of the Feedback	
	Şikâyet/Geri Bildirimin Detaylı Tarifi Detailed Description of the Grievance/Feedback	
	Şikâyetin İlgili Olduğu Taraf (Şirket, Yüklenici, Altyüklenici, Üçüncü Taraf) Relevant to Project Company, Contractor, Subcontractor, Third-party, etc.	
	Aksiyon Olup Olmadığı Follow-up Action Required	
C. Alınacak Aksiyonlar (Bu kısım, O Kolonu'na verilen cevabın "Evet" olması halinde doldurulacaktır) Follow-up Actions (to be filled if the answer to Column O is "Yes")	Alınacak Düzeltici Aksiyon Corrective Action to be taken	
	Aksiyondan Sorumlu Taraf Responsible Party for the Action	
	Aksiyonun Alınmasından Sorumlu Departman Responsible Department (for implementation)	
	Aksiyonun Alınmasından Sorumlu Kişi Name of the Responsible Person for the Action	
	Aksiyonun Alınmasından Sorumlu Kişinin Pozisyonu Position of the Responsible Person for the Action	
	Aksiyonun Tamamlanacağı Tarihi Due Date for Action	
	Aksiyonun Durumu Action Status	
	Aksiyonun Tamamlandığı Tarihi Completion Date for Action	
İlgili / Destekleyici Dokümanlar Related / Supplementary Documents		
Şikâyet/Geri Bildirimin Durumu Status of the Grievance/Feedback		

Doküman Document:		İÇ ŞİKÂyet/ÖNERİ TAKİP VERİ TABANI (INTERNAL GRIEVANCE/SUGGESTION REGISTER)
Son <i>Date of Last Revision</i>	Revizyon	Tarihi
Son Revizyonu Yapan Kişi <i>Person who made the Last Revision</i>		
	Şikayet/Geri Bildirimin Kapatıldığını Teyit Eden Proje Personeli <i>Name of the Project Personnel who Confirmed Closure of the Grievance/Feedback in the Database</i>	
	Paydaş Şikayet/Geri Bildirimin Kapatıldığını Dair Bilgilendirildiği Tarih <i>Date the Stakeholder Notified about the Closed Status</i>	
	Toplam Şikayet/Geri Bildirim Kapanış Süresi <i>Total Feedback/Grievance Closure Duration</i>	
	Paydaş Şikayet/Geri Bildirimin Kapatılmasından Memnun Mu? <i>Is the Stakeholder Satisfied about the Closure of the Grievance/Feedback?</i>	
	Kapatılmadı ise Nedeni <i>Reason for Overdue Closure</i>	
	Kapanış ile İlgili / Destekleyici Dokümanlar <i>Related / Supplementary Documents for Closure</i>	

VIII.3 Key Performance Indicator

KPI	Target	Frequency	Responsible	Data Source
Number of public consultation meetings conducted	1 per 30 km stretch)	Semiannually / construction phase Annually / operational phase	CLO, E&S Manager	Meeting reports, photos
% of meetings with at least one female facilitator	100%	Each meeting	CLO, Female Staff	Participant list
% of female participants in community meetings	At least 40% (if not separate female meeting will be conducted)	Semiannually / construction phase Annually / operational phase	CLO	Disaggregated participant data
Number of WhatsApp / digital announcements posted	Min. 2/month/region	Monthly	CLO,	Screenshots, message logs
Number of grievances received from women	Separate tracking required	Monthly	Female CLO	GM logs
% of grievances resolved within 30 days	75%	Monthly	Environment and Social Manager	GM logs
Number of grievance channels accessible to illiterate or elderly PAPs	At least one in each sub-region (Serik, Manavgat, Alanya)	Ongoing	CLO	Field visits, GM audit
Number of GBV or SEAH trainings held	one per campsite before construction	Pre-construction	H&S Manager, Female CLO	Training logs
Number of engagement events for vulnerable groups (women, Yörüks, refugees)	Min. One per group per year	Annual	CLO, E&S Manager	Meeting records
Number of satisfaction surveys conducted (incl. gender focus)	2/year	Biannual	Female CLO	Survey results maintained by the SPV General Manager
% of brochures/materials with visual/auditory accessibility	90%	Before dissemination	E&S Manager, Social Chief	Outreach records
Increase women's participation in employment by 2029	30%	Annual (2029–2032)	SPV General Manager	Personnel records maintained by SPV General Manager
Increase women's participation in employment by 2032	35%	Annual (2032–2035)	SPV General Manager	Personnel records maintained by SPV General Manager
Increase women's participation in employment by 2035	40%	Annual (2035–2040)	SPV General Manager	Personnel records maintained by SPV General Manager
Maintain women's participation at Board level by 2035	40%	Annual (2029–2040)	SPV General Manager	Board composition records maintained by SPV General Manager